References

June 25, 1996

Texas Natural Resources & Conservation Commission
12100 Park 35 Circle
Austin, Texas 78753

Attention: Mr. Paul S. Lewis, Manager
Corrective Action Section
Industrial and Hazardous Waste Division

Subject: **The Goodyear Tire & Rubber Company - Pasadena, Texas**
TNRCC Solid Waste Registration No. 30316
EPA ID No. TXD074185141
Interim Status Hazardous Waste Unit - Aeration Pond Closure Plan
LAW Project 50521-6-8800

Dear Mr. Lewis:

On behalf of the Goodyear Tire and Rubber Company (Goodyear), Law Engineering and Environmental Services, Inc. (LAW) is issuing this report regarding the status of closure of the referenced unit. LAW prepared the *Closure Plan - Bayport Aeration Pond Bayport Chemical Plant* dated June 24, 1995 which was subsequently approved with modifications by the TNRCC in a letter to Goodyear dated December 29, 1995. Included in this report is Goodyear's response to these modifications and a proposed recommendation to treat the contaminated media in the aeration pond utilizing bioremediation.

It is Goodyear's intention to try to close the pond under Risk Reduction Standard II (RRS II) through bioremediation, however in the event Goodyear is unable to attain the required treatment standards for RRS II they will close the unit under RRS III as previously planned. Since Goodyear is trying to initiate field work as soon as possible we would appreciate your review of this proposal

9810 BLUEGRASS PARKWAY • LOUISVILLE, KENTUCKY 40299
502-495-5800 • FAX 502-495-5801
ONE OF THE LAW COMPANIES

at your earliest convenience. We can set-up a conference call or if necessary we could meet with you in your office to discuss the scope of the project. If you have any questions or comments regarding this report please call Mr. Steve Surofchek of Goodyear at (713) 474-0044.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

Robert A. Perkins, P.G.
Senior Hydrogeologist

Richard J. Mazzoni, P.E.
Principal

cc: Mr. Sonny Rayos
TNRCC Region 12
Steve Surofchek (Goodyear)
Mark Whitmore (Goodyear)

1.0 INTRODUCTION

The Goodyear Tire & Rubber Company's (Goodyear's) Bayport Plant manufactures specialty chemicals used in the production of synthetic rubber at other Goodyear operations. The plant is located at 13441 Bay Area Boulevard in Pasadena, Texas (Figure 1). A former aeration pond is on Goodyear property. The pond is an open, rectangular, concrete-sided, native clay-bottomed, 2.25 million gallon unit where process water was pretreated prior to discharge to the Gulf Coast Waste Disposal Authority, a publicly owned treatment works. The unit measures approximately 280 feet by 130 feet (Figure 2). Engineering drawings indicate that the distance from the top of the dike to the original clay bottom is approximately 10 feet. Goodyear is in the process of closing this surface impoundment through the TNRCC Corrective Action Section.

Previous analyses of wastewater from the aeration pond detected hydroquinone, acetone, and benzene. The analyses were conducted for Goodyear by outside commercial laboratories. Upon the implementation of the toxic characteristic leaching procedure (TCLP) regulations on September 25, 1990, water from the aeration pond became classified as a characteristic hazardous waste due to a detected TCLP benzene concentration. Subsequently, to initiate the closure process, Goodyear submitted a Part A and a Part B permit application to the Texas Water Commission (now the Texas Natural Resource and Conservation Commission (TNRCC)) in 1990 and 1991, respectively. The pond is presently regulated under interim status rules, and quarterly groundwater monitoring is required.

In June 1991, Metcalf & Eddy, Inc. (M&E) installed four groundwater monitoring wells and one piezometer adjacent to the aeration pond (Figure 2). In July 1991, M&E initiated quarterly groundwater sampling of the four monitoring wells for collection of the "first-year" background data as required under interim status. Quarterly reports documenting these sampling events were submitted to the TNRCC. After the background data had been collected, LAW was retained to continue the groundwater sampling program on a semi-annual basis and to assist Goodyear in preparing the annual report of groundwater monitoring. As part of the annual reporting requirements under Texas Administrative Code (TAC) 335.117, Goodyear was required to perform statistical comparisons of the data to ascertain if a significant increase (or decrease in pH) in indicator parameters had occurred.

In May 1995 Goodyear requested and was given approval to implement an alternate monitoring groundwater program. It was also during this time that TNRCC requested that an additional monitoring well be installed along the western side of the pond. Goodyear complied with the TNRCC's request and the well (MW-5) was installed and sampled during the November 1995 semi-annual sampling event. It was during this sampling event that a groundwater sample from well MW-5 yielded benzene at a concentration of 310 micrograms per liter (µg/l). Subsequent re-sampling confirmed the presence of benzene at 65 µg/l. TRNCC's drinking water maximum concentration limit for benzene in groundwater is 5.0 µg/l. The detection of benzene in groundwater shifted groundwater monitoring from detection monitoring to compliance monitoring and quarterly sampling was initiated.

30316

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

PERMIT APPLICATION FOR A
HAZARDOUS WASTE STORAGE/PROCESSING/DISPOSAL FACILITY

PART A - FACILITY BACKGROUND INFORMATION

I. GENERAL INFORMATION

A. Applicant: The Goodyear Tire & Rubber Company
(Individual, Corporation, or Other Legal Entity Name)

Address: P.O. Box 26003

City: Beaumont State: Texas Zip Code: 77720-6003

Telephone Number: (409) 794-5230

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.

00017858-06
(Charter Number)

B. Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

Please See Attachment I.B.-1

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

C T Corporation Systems
350 North St. Paul Street
Dallas, Texas 75201

as applicant.

Name: Same as Applicant

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____ Charter Number: _____

D. Ownership

1. Indicate the ownership status of the facility:

a. Private ___X___

(1)	Corporation	___X___
(2)	Partnership	_____
(3)	Proprietorship	_____
(4)	Non-profit organization	_____

b. Public _____

(1)	Federal	_____
(2)	Military	_____
(3)	State	_____
(4)	Regional	_____
(5)	County	_____
(6)	Municipal	_____

c. Other (specify) _____

2. Does the applicant own the facility units and facility property?

__X___ Yes _____ No

If you checked "no",

a. Submit as "Attachment A" a copy of the lease for use of or the option to buy said facility units and/or facility property, as appropriate; and

b. Identify the facility units owner and/or facility property owner. Please note that the owner is required to sign the application on page 5.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Application Submittal:

1. Initial _____ or Revision __X__

2. If a revision, provide the date of the initial Part A submittal. __8/8/91__

F. Registration and Permit Information

Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit number, or the date of application, or "none".

	Relevant Program and/or Law	Permit No.	Government Agency*
1.	Texas Solid Waste Disposal Act	None	
2.	Wastewater disposal under the Texas Water Code	00519	TNRCC
3.	Underground injection under the Texas Water Code	None	
4.	Texas Clean Air Act	20040, 22110, R-1040 9481, 3522	TNRCC
5.	Texas Uranium Surface Mining & Reclamation Act	None	
6.	Texas Surface Coal Mining & Reclamation Act	None	
7.	Hazardous Waste Management program under the Resource Conservation and Recovery Act	None	
8.	UIC program under the Safe Drinking Water Act	None	
9.	NPDES program under the Clean Water Act	TX0005061	EPA
10.	PSD program under the Clean Air Act	20040/PSD-TX-801	EPA
11.	Nonattainment program under the Clean Air Act	None	
12.	National Emission Standards for Hazardous Pollutants (NESHAP) preconstruction approval under the Clean Air Act	None	

14.	Dredge or fill permits under section 404 of the Clean Water Act	None	
15.	Other relevant environmental permits	None	

*Use the following acronyms for each agency as shown below:

TNRCC = Texas Natural Resource Conservation Commission
TRC = Texas Railroad Commission
TDH = Texas Department of Health
TDA = Texas Department of Agriculture
EPA = U.S. Environmental Protection Agency
CORPS = U.S. Army Corps of Engineers

G. Description of Business

1. Give a brief description of the nature of your business.

Storage and purification of organic raw materials for use in manufacturing process.
Manufacture of synthetic rubber.
Manufacture of tackifier resin and antioxidants.

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

Plastic Materials and Resins	2821
Synthetic Rubber	2822
Industrial Organic Chemicals	2869

I, _____ _____
(owner) (Title)

Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____, Date: 4/16/97
(applicant)

Signature: _____, Date: _____
(owner)

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT

I, _____ hereby designate _____
(applicant) (agent)

as my agent and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Natural Resource Conservation Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

_____
Printed or Typed Name of Applicant or Principal Executive Officer

_____
Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

SUBSCRIBED AND SWORN to before me by the said Dennis E Dick on this 16th day of April, 1997.

My commission expires of the 13th day of October, 1997.

_____
Notary Public in and for

LINDA SNOWBALL, Notary Public
Residence [illegible] County
State Wide [illegible] Ohio
My Commission Expires Oct. 13, 1998

Lucas County, ~~Texas~~ Ohio

A. Location of Facility for which the application is submitted

1. Facility Name: The Goodyear Tire & Rubber Company

TNRCC Solid Waste Registration No.: 30012 EPA I.D. No.: TXD008077190

Street Address, if available: IH-10 Southwest at Smith Road

City: Cheek, Texas Zip Code: 77705

County: Jefferson

2. Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.

Site is approximately 10 miles southwest of Beaumont on south side of IH-10, between IH-10 and FM 124.

3. Detail the access routes from the nearest U.S. or State Highway to the facility.

West bound on IH-10 from Beaumont, exit Smith Rd.
Turn left onto overpass.
Take next left, go under overpass.
Follow two-lane access road on south side of IH-10 for 1 mile.

4. Submit as "Attachment B" a United States Geological Survey (USGS), 7 1/2 minute quadrangle map. Indicate on this map the location of the facility and the land use patterns of the areas within 1 mile (1.6 km) of the facility boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map or a city map with sufficient scale to adequately show the facility location and surrounding land use patterns. (Submission of an aerial photograph is recommended as it may clarify land use, topography, vegetation, etc., within the vicinity of the facility.) This map and accompanying text should include the following information:

a. existing zoning at the facility (if within the territorial limits of a city);

b. location and distance to nearest residences, schools or other centers of community activity;

c. location of any utility easements, pipelines, or any underground oil and gas storage areas;

5. Enter the geographical coordinates of the facility:

Latitude: 29 deg 58 min 33.2 sec

Longitude: 94 deg 13 min 4.3 sec

___Yes _X_No

B. Legal Description of Facility

Submit as "Attachment C" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s).

III. WASTES AND WASTE MANAGEMENT

A. Waste Generation and Management Activities

Is any hazardous waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

_X_Yes ___No

If you checked "no," go to Section III.B.2 below.
If you checked "yes," answer the following question.

1. Are you presently registered with TNRCC as a solid waste generator?

_X_Yes ___No ___Pending

If you checked "no," contact the Industrial and Hazardous Waste Division of TNRCC in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If you checked "yes," go to Section I of your TNRCC Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1 below, listing all hazardous wastes, all mixtures containing any hazardous wastes, and hazardous debris which were, are presently, or are proposed to be handled at your facility. (see 40 CFR 261 and 268.2), attaching additional copies as necessary. *Note: The facility in question is understood to be the facility subject to permitting*

In this table, "TNRCC Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TNRCC, enter "NA" for TNRCC Sequence Number and TNRCC Waste Code Number).

For the EPA Hazard Code and EPA Hazardous Waste Codes, see 40 CFR 261.20-33. Fo annual quantity, provide the amount in units of pounds (as generated and/or received) for each waste and/or waste mixture.

Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), complete Table III-2 and enter the name of each hazardous waste management unit(Note: Please make copies of Table III-2 if necessary).

Give the design capacity of each hazardous waste management unit in any of the units of measure shown. In the case of inactive or closed units for which design details are unavailable, an estimate of the design capacity is sufficient.

Please provide a verbal description for each waste management unit described in your own words on the line provided for "Waste Management Unit."

2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

__X__Yes _____No

If you checked "yes," complete Table III-2 indicating the hazardous waste management units which were once utilized at your plant site but are no longer in service (i.e., inactive or closed facility units).

If you checked "no," and if no hazardous waste is presently or proposed to be stored [for longer than 90 days (see 30 TAC Section 335.69)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. Provide an estimate of the total weight (lbs) of hazardous waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

Zero pounds of hazardous waste estimated to have been disposed of and/or presently stored on-site at Goodyear's facility. According to TNRCC guidance, this question does not pertain to waste stored prior to on-site treatment.

C. Location of Waste Management Units

1. Submit as "Attachment D" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the facility boundaries, depicting the following:

a. The approximate boundaries of the facility (described in Section II.B) and within these boundaries., the location and boundaries of the areas occupied by each active, inactive, and proposed hazardous waste management unit (see Table III-2). Each depicted area should be labeled to identify the unit(s), unit status (i.e., active, inactive, or proposed), and areal size in acres.

See 830-D-2012

b. The overall facility and all surface intake and discharge structures;

See 830-D-2012

c. All on-site injection wells where liquids are injected underground;

Not Applicable

d. All known monitor wells and boreholes within the property boundaries of the facility; and

See 830-D-2009

e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the

processing and disposal units.

D. Flow Diagram/Description

Show as "Attachment F" process flow diagrams and step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. INDEX OF ATTACHMENTS

List and index below all attachments to this application and indicate if included or not included:

Item	Attachments	Attachment	Included	Not Included
I.D.2.a.	Lease/option to buy	A	____	X
II.A.4	USGS map	B	X	____
II.B	Site legal description	C	X	____
III.C.1	Facility boundaries and adjacent waters map	D	X	____
III.C.2	Photographs	E	X	____
III.D	Process flow diagram/description	F	X	____

Table III-1 Hazardous Wastes and Management Activities

Verbal Description of Waste	TNRCC Seq. No.	TNRCC Waste Code No.	EPA Hazard Code	EPA Hazardous Waste Code	Waste Management Activities				Annual Quantity Generated and/or Received	P
					Off-site	On-site				
					Disposal	Storage[1]	Processing[2]	Disposal		
Lab Waste	0010	219 H	I,E	D001,D018,D025			X		13,000 lbs	
Oily Polymer	0014	219 H	I,E	D001,D018,D025			X		3.9×10^5 lbs	
Miscellaneous Hydrocarbons	0019	219 H	I,E	D001,D018			X		5.3×10^6 lbs	
Stream A/B & KO Pot Hydrocarbons	0020	219 H	I,E	D001,D018,D025			X		9.7×10^6 lbs	

[1]"Storage" means the holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, or stored elsewhere

[2]"Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutra hazardous waste, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material from the waste render such waste non-hazardous or less hazardous, safer for transport, store or dispose of, or amenable for recovery, amenable for storage, or reduced in volume The "transfer" of solid waste for reuse or dispo above, does not include the actions of a transporter in conveying or transporting solid waste by truck, ship, pipeline, or other means Unless the Executive Director determines that regulation of such activity is n protect human health or the environment, the definition of "processing" does not include activities relating to those materials exempted by the Resource Conservation and Recovery Act, 42 U S C 6901 amended

TABLE III-2 Hazardous Waste Management Unit Checklist

Waste Management Unit	TNRCC N.O.R. Unit #	Status[1]	Design Capacity[2]	Number of Years Utilized	Date in Service
Boiler B101	007	Active (Interim Status)	100,000 lbs steam/ hr	36	1961
Boiler B102	016	Active (Interim Status)	100,000 lbs steam/ hr	36	1961
Boiler B103	017	Active (Interim Status)	100,000 lbs steam/ hr	36	1961
Boiler B104	018	Active (Interim Status)	100,000 lbs steam/ hr	32	1965
Boiler B105	019	Active (Interim Status)	100,000 lbs steam/ hr	32	1965
Fire Training Pit	NA	Closed	NA	17	1961
Consumat Incinerator[3]	002	Inactive	500 lbs/hr	15	1971
Burn Pit	NA	Closed	NA	6	1961
Open-top Incinerator	NA	Closed	NA	6	1966
B1601 Catalyst Burner	NA	Closed	3 gal/min	13	1961
F3201A	020	Active (Permit Exempt)	14,000 lbs/yr	27	1970
Wastewater Treatment Plant [4]	014	Inactive	3.8 MM gal/day	21	1969
Settling Pond[4]	011	Inactive	14,000 lbs/hr	3	1987

[1]Indicate only one of the following: Active, Inactive, Closed, or Proposed
[2]Cubic yards, gallons, pounds, gallons/minute, pounds/hour, BTUs/hour, etc.
[3]Presently active for non-hazardous waste only Recieved D001 hydrocarbon prior to 1986.
[4] These units presently recieves non-hazardous waste only. They recieved D025 WW prior to 1990. WWTP includes East and West Wing Basins. Settling pond known as Horseshoe Pond is part of WWTP but registered separately on TNRCC NOR

List of Authorized Persons

John B. Herron
Environmental Engineer
The Goodyear Tire & Rubber Company
P.O. Box 26003
Beaumont, Texas 77720-6003
(409)794-5429

Paula L. Somerville
Section Head, Environmental Engineering
The Goodyear Tire & Rubber Company
P.O. Box 26003
Beaumont, Texas 77720-6003
(409)794-5282

Don E. Smith
Manager, Health, Safety, and Environmental
The Goodyear Tire & Rubber Company
P.O. Box 26003
Beaumont, Texas 77720-6003
(409)794-5207

Steve K. Gartside
Plant Manager
The Goodyear Tire & Rubber Company
P.O. Box 26003
Beaumont, Texas 77720-6003
(409)794-5231

Dennis E. Dick
Vice President and General Manager. Chemical Products
The Goodyear Tire & Rubber Company
1144 E. Market St.
Akron, OH 44316
(330)796-7620

Takisha Ito
Attorney
The Goodyear Tire & Rubber Company
1144 E. Market St.
Akron, OH 44316
(330)796-3084

Industrial and Hazardous Waste Division
P. O. Box 13087
Austin, Texas 78711-3087

INDUSTRIAL AND HAZARDOUS WASTE PART B PERMIT APPLICATION

I GENERAL INFORMATION

A. Applicant: The Goodyear Tire & Rubber Company
(Individual, Corporation, or Other Legal Entity Name)

Address: P.O. Box 26003

City: Beaumont State: Texas Zip Code: 77720-6003

Telephone Number: (409) 794-5230

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas.

00017858-06
(Charter Number)

B. Authorized Persons

1. List those persons or firms, including a complete mailing address and telephone number, authorized to act for the applicant during the processing of the permit application.

Please see Attachment I.B.-1

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

C T Corporation Systems
350 North St. Paul Street
Dallas, Texas 75201

3. List the individual and his/her mailing address that will be responsible for causing notice to be published in the newspaper.

John B. Herron
The Goodyear Tire & Rubber Company
P.O. Box 26003
Beaumont, Texas 77705

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[1]The operator has the duty to submit an application [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on Part A of this application [Section 361.087, Texas Solid Waste Disposal Act].

Address: IH-10 Southwest at Smith Road

City: Beaumont Texas Zip Code 77705

Telephone Number (409) 79405230

TNRCC Registration No 33012 EPA I D No TXD008077190

County: Jefferson

I. D. Application Type and Facility Status

1.

X permit	___ amendment	___ modification
___ new	___ major	___ Class 3
X interim status	___ minor	___ Class 2
___ renewal		___ Class 1
___ RD&D		___ Class 1

2. In either column, check all that apply.

___ proposed hazardous waste management facility	X existing hazardous waste management facility
___ on-site	X on-site
___ off-site	___ off-site
___ commercial	___ commercial
___ recycler	___ recycler
___ land disposal	___ land disposal
	___ areal or capacity expansion

3. Provide a brief verbal description of the portion of the facility covered by this application, including the changes for which an amendment or modification is requested.

Boilers B101, B102, B103, B104, and B105 are identical Babcock and Wilcox Model No. FO-27 water tube units which are able to fire on natural gas, waste fuel, or a combination of both.

YES____ NO_X__

2. in wetlands?

YES____ NO_X__

3. in the critical habitat of an endangered species of plant or animal?

YES____ NO_X__

4. on the recharge zone of a sole-source aquifer?

YES____ NO_X_

5. in an area overlying a regional aquifer?

YES____ NO_X__

6. (for a new commercial hazardous waste management facility or subsequent areal expansion of such a facility or unit of that facility as defined in 30 TAC 335.202) within ½ of a mile (2,640 feet) of an established residence, church, school, day care center, surface water body used for a public drinking water supply, or dedicated public park?

YES____ NO____ Not Applicable: Existing Facility

If YES, the TNRCC shall not issue a permit for this facility.

1. F. Wastewater and Stormwater Disposition

1. Is the disposal of any waste to be accomplished by a waste disposal well at this facility?

_X_ NO __ YES (WDW Permit No(s). _____)

2. Will any point source discharge of effluent or rainfall runoff occur as a result of the proposed activities?

__ YES _X_ NO

3. If YES, is this discharge regulated by a NPDES or TNRCC permit?

__ YES Permit No. _____(TNRCC)
Permit No. _____(NPDES)

__ NO Date TNRCC discharge permit application filed _____
Date NPDES discharge permit application filed _____

addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch, or drawing with a scale adequate enough to show the cross-referenced affected landowners. The list should be updated prior to any required public notice.

I. II. Signature on Application

The person who signs the application form will often be the applicant himself; when another person signs on behalf of the applicant, his title or relationship to the applicant will be shown. In all cases, the person signing the form must be authorized to do so by the applicant. An application submitted by a corporation must be signed by a principal executive officer of at least the level of vice president or by his duly authorized representative, if such representative is responsible for the overall operation of the facility from which the activity described in the form originates. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor, respectively. In the case of a municipal, state, federal, or other public facility, the application must be signed by a principal executive officer, a ranking elected official, or another duly authorized employee. A person signing an application on behalf of an applicant must provide notarized proof of authorization.

certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fines.

Signature: _____ Date: 4/16/97

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT

I, _____, hereby designate _____
(Print or Type Name) (Print or Type Name)

as my agent and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Natural Resource Conservation Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

_____
Printed or Typed Name of Applicant or Principal Executive Officer

_____
Signature

SUBSCRIBED AND SWORN to before me by the said DENNIS E. DICE

on this 14th day of APRIL, 1997

My commission expires on the 13th day of OCTOBER, 1998

LINDA SNOWBALL, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires Oct. 13, 1998

_____
Notary Public in and for
SUMMIT County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)

SWR # 30316

CAS #/DOC # 12074
PROJ. MGR SRayos

U027

LAWGIBB GROUP

THIRD QUARTER GROUNDWATER MONITORING REPORT & SUMMARY of ANNUAL MONITORING

AERATION POND
BAYPORT CHEMICAL FACILITY
PASADENA, TEXAS

Prepared for:

THE GOODYEAR TIRE & RUBBER COMPANY

Akron, Ohio

January 22, 2001

LAWGIBB GROUP

SWR #_____

CAS #/DOC # _____
PROJ. MGR _____

January 22, 2001

Texas Natural Resources & Conservation Commission
12100 Park 35 Circle
Austin, Texas 78753

Attention: Mr. Sonny Rayos

RECEIVED
FEB 21 2001
REMEDIATION DIVISION
Corrective Action Section

Subject: **2000 Annual Groundwater Monitoring Report**
Bayport Chemical Facility
Pasadena, Texas
LAW Project 50521-8-6648-01-900
TNRCC ID # TXDO74185141

Dear Mr. Rayos:

On behalf of our client, The Goodyear Tire & Rubber Company, Law Engineering and Environmental Services, Inc. (LAW) is pleased to submit this Annual Report of Groundwater Monitoring for the Bayport Chemical Manufacturing Facility in Pasadena, Texas. The enclosed report is intended to satisfy the annual groundwater reporting requirements as prescribed by Texas Administrative Code (TAC) 335.117.

Goodyear is in the process of closing the related surface impoundment under Texas Administrative Code (TAC) 335 Risk Reduction Standard II. With the completion of the third quarter sampling event we finish two years of continuous groundwater monitoring since completion of closure activities. During this two year period all groundwater samples have been below maximum concentration levels (MCLs) and indicate that additional monitoring is not warranted. Therefore, we are requesting that the TNRCC terminate post closure care and remove the Former Aeration Pond from further RCRA compliance. We are also requesting approval to remove all associated monitoring wells.

Goodyear believes that the enclosed Annual Groundwater Monitoring Report satisfies TNRCC requirements, and requests an acceptance letter from TNRCC to be included as part of the project file. Should you have any questions or comments concerning the enclosed report, please contact Mr. Steve Surofchek (Technical Specialist-Environmental) of Goodyear at (713) 474-0044 or Mr. Robert Perkins at Law at (502) 495-5800.

Sincerely Yours,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

Dean A. Duncan, P.G.
Principal

Robert A. Perkins, P.G.
Senior Hydrogeologist

cc: Steve. Surofchek (Goodyear)
Mark Whitmore (Goodyear)

LAW Engineering and Environmental Services, Inc.
9810 Bluegrass Parkway • Louisville, KY 40299
502-495-5800 • Fax: 502-495-5801

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1.0 INTRODUCTION

The Goodyear Tire & Rubber Company's (Goodyear) Bayport Plant manufactures specialty chemicals used in the production of synthetic rubber at other Goodyear operations. The plant is located at 13441 Bay Area Boulevard in Pasadena, Texas (Figure 1). A former aeration pond was located on the Goodyear property. The pond was an open, rectangular, concrete-sided, native clay-bottomed, 2.25 million gallon unit where process water was pretreated prior to discharge to the Gulf Coast Waste Disposal Authority, a publicly owned treatment works. The former unit measured approximately 280 feet by 130 feet (Figure 2). Engineering drawings indicate that the distance from the top of the dike to the original clay bottom was approximately 10 feet. Goodyear closed this surface impoundment through the Texas Natural Resources and Conservation Commission (TNRCC) Corrective Action Section in 1998.

Previous analyses of wastewater from the aeration pond detected hydroquinone, acetone, and benzene. Upon the implementation of the toxic characteristic leaching procedure (TCLP) regulations on September 25, 1990, water from the aeration pond became classified as a characteristic hazardous waste due to a detected TCLP benzene concentration. Subsequently, to initiate the closure process, Goodyear submitted a Part A and a Part B permit application to the Texas Water Commission (now TNRCC) in 1990 and 1991, respectively. The pond is presently regulated under interim status rules, and quarterly groundwater monitoring is required.

In June 1991, Metcalf & Eddy, Inc. (M&E) installed four groundwater-monitoring wells and one piezometer adjacent to the aeration pond (Figure 2). In July 1991, M&E initiated quarterly groundwater sampling of the four monitoring wells for collection of the "first-year" background data as required under interim status. Quarterly reports documenting these sampling events were submitted to the TNRCC. After the background data had been collected, LAW was retained to continue the groundwater-sampling program on a semi-annual basis and to assist Goodyear in closing the pond.

In May 1995 Goodyear requested and was given approval to implement an alternate monitoring groundwater program. It was also during this time that the TNRCC requested that an additional monitoring well be installed along the western side of the pond. Goodyear complied with the TNRCC's request and monitoring well MW-5 was installed and sampled during the November 1995 semi-annual sampling event.

During this sampling event a groundwater sample from well MW-5 yielded benzene at a concentration of 310 micrograms per liter (µg/l). Subsequent re-sampling confirmed the presence of benzene at 65 µg/l. TNRCC's drinking water maximum concentration limit for benzene in groundwater is 5.0 µg/l. The detection of benzene in groundwater shifted groundwater monitoring from detection monitoring to compliance monitoring and quarterly sampling was initiated.

Since the pond was no longer in service Goodyear moved forward to permanently close the unit under risk based closure regulations. Goodyear utilized in-situ bioremediation methods to remove contaminants from affected media. By the summer of 1998 contaminants were within risk rule standard II and the TNRCC approved closure. As part of the closure process Goodyear was required to collect groundwater-monitoring samples on a quarterly basis for two years. With the completion of the third quarter sampling event the two-year monitoring requirement has been fulfilled. No contaminants were detected in groundwater above maximum concentration levels (MCLs) and it is now time to terminate all activities.

This report is a summary of the annual groundwater monitoring activities conducted during 2000 and includes additional data for the third quarter event. First and second quarter monitoring reports were prepared previously and submitted to the TNRCC as separate reports. Information and data from those two reports were not included in this report unless the findings significantly effected our conclusions.

2.0 HYDROGEOLOGY

2.1 GEOLOGIC SETTING

The site is located within the Coastal Plain physiographic province in eastern Texas, several miles east of Houston. Foundation, geotechnical, and monitoring well installation boring logs from the site indicate three basic units in the upper 50 feet underlying the site: an upper stiff to very stiff clay, underlain by a water-bearing silt, which overlies a lower silty clay/clayey silt. These units are part of the Beaumont Formation of Pleistocene age consisting of heterogeneous, thick interbedded layers of clay and silt units interpreted as having been deposited in an inter-deltaic plain setting.

In the vicinity of the aeration pond, the upper clay unit occurs from ground surface to a depth of approximately 25 feet below ground level (bgl). Variations in color, stiffness, and silt content exist within this clay unit. The first water-bearing zone occurs at depths approximately 25 feet or greater and contains material ranging from a clayey silt to a silty clay. This water-bearing unit is approximately 10 feet thick, extending from about 25 feet to 35 feet bgl. The lower silty clay/clayey silt unit extends from approximately 35 feet to at least 50 feet bgl, the bottom of the deepest boring on-site. Two stratigraphic geologic cross-sections were prepared from available subsurface data and are shown on Figure 3. The locations of the cross-sections, with respect to the impoundment, are shown on the site plan (Figure 2).

2.2 GROUNDWATER FLOW DIRECTION

All monitoring wells were surveyed both horizontally and vertically for use in determining groundwater flow direction. Groundwater elevation measurements were collected during all quarterly sampling events. Data for the third quarter sampling event is provided in Table 1. Potentiometric surface maps were prepared for all of the sampling events, with the third quarter sampling map presented as Figure 4. As noted during previous years of monitoring, the primary direction of groundwater flow is toward the southwest and continues to remain consistent with recent data.

2.3 GROUNDWATER FLOW VELOCITY

The average hydraulic gradient in the vicinity of the aeration pond on September 28, 2000 was calculated to be approximately 0.00298 ft/ft and is similar to past sampling events. The flow velocity is determined by the following formula:

$$i = (H1 - H2)/L$$

L: horizontal distance between water level measurements (ft);
H1 - H2: vertical difference in water level measurements (ft); and
i: hydraulic gradient (ft/ft).

Average groundwater linear velocities in the uppermost aquifer were approximated using the Darcy equation:

$$v = (Ki)/n$$

K: hydraulic conductivity (ft/day);
n: effective porosity (%);
i: average hydraulic gradient (ft/ft); and
v: average linear groundwater flow velocity (ft/day).

An average linear velocity of 0.045 ft/day (approximately 15.33 ft/yr) was calculated for the site using an average hydraulic gradient of 0.00298 (ft/ft), an effective porosity of 10%, and a hydraulic conductivity of 1.5 ft/day. This calculated velocity is similar to observed velocities from previous monitoring events. Hydraulic conductivity and porosity values used in this calculation were estimated from the literature (Freeze & Cherry, 1979; Fetter, 1988; and the USEPA, 1986 and 1992) based on similar geologic materials.

3.0 GROUNDWATER MONITORING NETWORK DESCRIPTION

As previously mentioned, four monitoring wells and one piezometer were installed in June of 1991 near the impoundment to better ascertain the localized direction of groundwater flow and to initiate groundwater sampling. The four monitoring wells were installed adjacent to each of the rectangular impoundment's four sides as shown on Figure 4. The piezometer is located approximately 300 feet northwest of the impoundment and is used to monitor water levels away from the surface impoundment. To better monitor groundwater quality along the western boundary of the pond, an additional monitoring well (MW-5) was installed in November 1995 and has subsequently been included as part of the monitoring well network. Based on historic groundwater flow patterns, monitoring well MW-3 was determined to be upgradient of the impoundment (i.e. redundant to existing upgradient well MW-1) and consequently was not sampled in 1996 or 1997. On October 22, 1997, MW-3 was properly abandoned by removing the screen and riser and grouting the borehole with a cement-bentonite mixture.

Piezometer/monitoring well installation procedures were previously submitted to the TNRCC in The Goodyear Tire & Rubber Company's *Groundwater Monitoring Plan* dated June 1991. A revised groundwater-monitoring plan that is specific to compliance monitoring was submitted to the TNRCC on April 24, 1996, and is also on file at the facility. The monitoring plan was prepared in accordance with 40 Code of Federal Regulations (CFR) 265.92 (d) (2)-(3) requirements.

The piezometer/well casings are Schedule 40 PVC with ten feet of slotted (0.010 inch) screen attached to the bottom of the well. The annular spaces of the borings were backfilled with a sand filter-pack within the screened interval. A two-foot thick bentonite seal was placed approximately 2 feet above the top of the screen, and a cement-bentonite slurry was added from the top of the bentonite seal to the ground surface. Piezometer/wells are secured with stick-up locking steel protectors in 3-foot square, 4-inch thick concrete pads.

4.0 THIRD QUARTER GROUNDWATER SAMPLING RESULTS - 2000

According to the approved groundwater monitoring plan, action levels established for volatile organic compounds and semi-volatile organic compounds (acetone, benzene, and phenol) were the maximum concentration levels (MCLs), while the levels for metals (lead, chromium, and barium) were to be determined statistically from historical data comparisons.

The parameters, analytical methods, and regulatory levels established by the TNRCC are presented below:

• Total Lead	Method 7421	10 µg/l
• Total Chromium	Method 6010	70 µg/l
• Total Barium	Method 6010	1000 µg/l
• Acetone	Method 8240	100 µg/l } MCLs
• Benzene	Method 8240	5 µg/l } MCLs
• Phenol	Method 8270	10 µg/l } MCLs

Wells MW-1, MW-2, MW-4, and MW-5 were sampled on September 28, 2000 for the previously mentioned parameters. No constituents were detected above regulatory levels in samples from the monitoring wells. Well sampling records and laboratory analytical data are presented in Appendices C and D, respectively.

4.1 ANNUAL GROUNDWATER SAMPLING SUMMARY RESULTS

The monitoring wells for the site were sampled during the First and Second Quarters 2000 for the previous mentioned parameters. No constituents were detected above regulatory levels in samples from the monitoring wells. Quarterly sampling reports were submitted to TNRCC in previous reports.

5.0 EVALUATION OF CURRENT GROUNDWATER MONITORING PROGRAM

As part of the closure process for the former aeration lagoon, Goodyear initiated fieldwork in the summer of 1996. The work was completed in the summer of 1999. All closure activities were coordinated and approved with Messrs. Richard Clark and Sonny Rayos of the TNRCC closure team.

The groundwater monitoring system at the Goodyear Facility meets the requirements of 31 TAC 335.117. Regulations specify that at least four wells shall be sampled on a quarterly basis and will include:

- One monitoring well hydraulically upgradient from the aeration pond.
- Three monitoring wells hydraulically downgradient from the aeration pond.

It should be noted that the primary criteria for the adequacy of a monitoring network is the hydraulic relationship between wells and the regulated unit. Groundwater contour maps have consistently indicated that the direction of groundwater flow is primarily in a southwesterly direction, confirming that the monitoring wells are properly positioned.

6.0 ANTICIPATED FUTURE ACTIVITIES

The former aeration lagoon was closed in the summer of 1999 through an intense series of remediation events that included both in-situ and ex-situ activities. The closure was approved by the TNCC and a two-year post closure care term was established for groundwater monitoring. This post closure care period was established to insure that closure activities had successfully removed contaminants that could possibly leach into the underlying groundwater aquifer. The results of the two-year groundwater-monitoring program indicate that no leaching of residual contaminants is occurring. **Based on these results, Goodyear requests that the TNRCC terminate post closure care and the associated groundwater-monitoring program. Goodyear also requests approval to properly remove and abandoned the four existing monitoring wells and the single piezometer.**

7.0 REFERENCES

Fetter, C.W., 1988, *Applied Hydrogeology*: Merrill Publishing Company, 592 p.

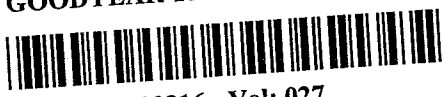
Freeze, R. Allan and Cherry, John A., 1979, *Groundwater:* Prentice-Hall, Inc., 604 p.

Metcalf & Eddy, Inc., December 1992, *Annual Ground Water Report of First Year Quarterly Monitoring at the Bayport Surface Impoundment at the Bayport Chemical Plant Pasadena, Texas*, 4 p.

United States Environmental Protection Agency, September 1986, *RCRA Ground-Water Monitoring Technical Enforcement Guidance Document (TEGD)*, 207 p.

United States Environmental Protection Agency, 1992 *RCRA Ground-Water Monitoring Draft Technical Guidance,* November 1992.

GOODYEAR TIRE AND RUBBER COMPANY



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REPORT 2001 THIRD QUARTER

SWR #30316

LAWGIBB GROUP

March 6, 2001

Mr. Stephen K. Akers, P.E.
Combustion Team 1, MC-130
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Natural Resource Conservation Commission

Subject: **Response to the Technical Notice of Deficiency for Closure Certification (Boiler M-526/Vessel V-411)**
The Goodyear Tire & Rubber Company
Bayport Chemical Plant
Pasadena, Texas
LAW Project 60160-0-7301.2

Dear Mr. Akers:

Law Engineering and Environmental Services, Inc. (LAW) is pleased to present this response to the Texas Natural Resource Conservation Commission (TNRCC) Technical Notice of Deficiency for Closure Certification (Boiler M-526/Vessel V-411), dated November 27, 2000, authored by Mr. Stephen K. Akers. This report presents and addresses each of the items identified in the November 27, 2000 letter. The information presented herein has been incorporated into the Revised Report of RCRA Hazardous Waste Management Unit Closure – Industrial Boiler M-526 and Storage Vessel V-411 that accompanies this letter.

Background Information

LAW issued a report of RCRA Hazardous Waste Management Unit Closure for Industrial Boiler M-526 and Vessel V-411 on September 6, 2000. This report was submitted to the TNRCC by The Goodyear Tire & Rubber Company (Goodyear) and reviewed by Mr. Steven K. Akers, P.E., Combustion Team 1, Industrial and Hazardous Waste Permits Section, Waste Permits Division, of the TNRCC. Mr. Akers drafted a letter dated November 27, 2000 outlining four closure certification deficiencies and two general comments. This report presents each of the certification

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5500 Guhn Road • Houston, Texas 77040
713-939-8444 • Fax: 713-462-1653

deficiencies and general comments followed by LAW's response on the behalf of The Goodyear Tire & Rubber Company.

Closure Certification Deficiency 1

In Section 2.1 (Rinsate Sampling Results) it is stated the rinse water sample "R-1" was analyzed for benzene using EPA test method SW846-8021B. In addition, it is in Section 2.4 (Excavation of Stained Soil and Analytical Results) that soil sample "Stockpile 1" was analyzed for benzene using EPA test method SW846-8021B as well. However, according to Section 4.3.4 (Analytical and Sampling Procedures) of your approved Closure Plan, EPA test method SW846-8260 would be used for benzene analyses of rinse water and soil samples. Given this, please justify why test method SW846-8021B was used in lieu of SW846-8260 for these analyses.

Response:
The use of EPA test method SW846-8021B to analyze water sample "R-1" and soil sample "Stockpile 1" for benzene was a laboratory error. This error did not adversely impact the accuracy of the reported benzene concentration in the samples. Please refer to the CORRECTIVE ACTION REPORT – METHOD OF BENZENE ANALYSIS FOR SAMPLES: "R-1", "TP-1", AND "STOCKPILE 1" from the laboratory, attached to this letter, that explains that method SW846-8021 provided the same results as method SW846-8260 would have provided.

Closure Certification Deficiency 2

Section 2.2.1 (Boiler M-526) states that "daily operating and inspection records for Boiler M-526, dated August 9, 1993 through February 19, 1999 were reviewed to determine if there had been a historical release of organic heavies." Please note that in order for the review of the operating and inspection records to be considered complete, the records must include information and/or data from time the boiler began burning hazardous wastes up until the time the boiler burned its final volume of hazardous waste. Therefore, please revise Section 2.2.1 to include the dates that the boiler began and stopped burning hazardous waste.

Please note that if the unit began burning hazardous waste prior to August 9, 1993 or stopped after February 19, 1999, the record search performed by Goodyear is considered incomplete.

Given this, if Goodyear is unable to perform a complete operating and inspection records review to determine if there had been any releases during the life of the boiler (i.e., period of time that the boiler burned hazardous waste), Goodyear must perform sampling and/or decontamination of the boiler containment area and the soil beneath the containment area.

Response:

Boiler M-526 began burning hazardous waste in January 1991 and ceased burning hazardous waste on September 8, 1999. LAW concurs that the review of daily operating and inspection records presented in the September 6, 2000 report did not completely address the entire time Boiler M-526 was burning hazardous waste. Consequently, LAW has reviewed additional daily inspection records for the period from February 19, 1999 through September 1999. In addition, The Goodyear Tire & Rubber Company Bayport Chemical Plant Unusual Occurrence Reports dated between January 1991 and December 1993 were reviewed by LAW. These reports describe any spill, release, malfunction, upset, injury, or near miss that occurs in the plant. A sample Unusual Occurrence Report is provided as an attachment to this letter.

A total of 105 reports were reviewed. One report, dated March 28, 1992 involved Boiler M-526. That report stated that a plant-wide power failure occurred. Residual fuel on the firebrick lining of the boiler remained on fire during the power failure. That fire quickly burned out. No evidence of a release of organic heavies to the environment from Boiler M-526, Vessel V-411, or associated piping was found during the document review. Based on this review, and the previous review, sampling and/or decontamination of the boiler containment area and the soil beneath the containment area are not warranted.

Closure Certification Deficiency 3

Section 2.4 (Excavation of Stained Soil and Soil Analytical Results) states that a "composite soil sample" was obtained for a benzene analysis from an excavated area near a transfer pump. Please note that compositing of soil samples that contain volatile organic compounds (VOCs) is considered unacceptable due to the tendency of the VOCs to volatilize when combining samples.

Therefore, since benzene is a VOC, Goodyear needs to re-perform the soil sampling (near the transfer pump) and analyses to determine the extent of the contamination in that area. Please note that the "extent of the contamination" is considered to be the area whereby the concentration for the constituents of concern exceed background levels. In addition, Goodyear should revise their CC report to provide the information required under 30 TAC §335.553(a).

Response:

On behalf of Goodyear LAW re-sampled the soil near the transfer pump by obtaining a grab sample (sample BH-5 @ 5') at a depth of five feet below the ground surface (BGS). To further delineate the vertical extent of potential benzene impact in soil in this area, a grab sample was also obtained at a depth of 10 feet BGS (sample BH-5 @ 10').

To comply with the requirement of 30 TAC 335.553(a) to characterize the horizontal extent of the benzene contamination, if any, left in-place, soil borings were installed to the north (borings BH-1 and BH-2), west (boring BH-3) and south (boring BH-4) of the transfer pump area. Soil investigation to the east of the transfer pump was prevented by the concrete containment structure for Vessel V-411.

The methods used to obtain the grab samples described above and the results of the laboratory analysis of the samples are discussed in the Revised Report of RCRA Hazardous Waste Management Unit Closure – Industrial Boiler M-526 and Storage Vessel V-411 attached to this letter.

Closure Certification Deficiency 4

The chain of custody form for rinse water sample "R-1" indicates that the pH check was not okay. Please explain how the pH being greater that 2 affected the benzene concentration results of the sample.

Response:

Water sample "R-1" was properly preserved with hydrochloric acid and chilled. Please refer to the to the CORRECTIVE ACTION REPORT – PRESERVATION OF SAMPLE: "R-1" from the laboratory, attached to this letter.

General Comment 1

Please note the since Goodyear is complying with Risk Reduction Standard No. 2 under 30 TAC §335 Subchapter S (Risk Reduction Standards) for soil remediation, Goodyear must also comply with the "Deed Certification" requirements of 30 TAC §335.560(b). Please note that the area described in 30 TAC §335.560(b)(2) is considered to be the contaminated area whereby the concentration for the constituents of concern exceed back ground levels.

Response:

On behalf of Goodyear, LAW performed additional soil assessment that defines the horizontal extent of the benzene contamination caused by the apparent release of organic heavies from the transfer pump for Vessel V-411. The results of that assessment and a model deed certification document are included in the Revised Report of RCRA Hazardous Waste Management Unit Closure – Industrial Boiler M-526 and Storage Vessel V-411 attached to this letter.

General Comment 2

Please note that there are two sections labeled "Section 2.1." Please correct this error.

LAW has corrected the Section labeling of the report.

We appreciate your cooperation in our efforts to finalize the closure of the subject hazardous waste management unit. Please contact us at 713-939-8444 if you have any questions regarding this submittal or require additional information.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

Timothy Ripstra
Project Manager

Dianne Seefried
Principal

Attachments: TNRCC Technical Notice of Deficiency, Dated November 27, 2000
Sample Unusual Occurrence Report
Laboratory Corrective Action Reports (2)
Revised Report of RCRA Hazardous Waste Management Unit Closure – Industrial Boiler M-526 and Storage Vessel V-411, dated March 2001.

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

November 27, 2000

Mr. Stephan R. Surofchek
Environmental Coordinator
Goodyear Tire and Rubber Company
13441 Bay Area Boulevard
Pasadena, Texas 77507

7000 0520 0023 2380 5803
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Technical Notice of Deficiency for Closure Certification (Boiler M-526/Vessel V-411)
Goodyear Tire and Rubber Company - LaPorte (Goodyear)
Hazardous Waste Permit No. HW-50024
Industrial Solid Waste Registration No. 30316
EPA Identification No. TXD074185141
Document No. 3366

Dear Mr. Surofchek:

We have completed a technical review of your Closure Certification (CC) report dated September 6, 2000 for Boiler M-526 and Storage Vessel V-411. Our review indicates that additional information must be presented to demonstrate compliance with Title 30 Texas Administrative Code (TAC) Sections 335.112(a)(6) and 40 Code of Federal Regulations (CFR) Parts 265, Subpart G (Closure and Post-Closure). The deficiencies noted are arranged to follow the format of your CC report.

Closure Certification Deficiencies

1. In Section 2.1 (Rinsate Sampling Results) it is stated the rinse water sample "R-1" was analyzed for benzene using EPA test method SW846-8021B. In addition, it is in Section 2.4 (Excavation of Stained Soil and Analytical Results) that soil sample "Stockpile 1" was analyzed for benzene using EPA test method SW846-8021B as well. However, according to Section 4.3.4 (Analytical and Sampling Procedures) of your approved Closure Plan, EPA test method SW846-8260 would be used for benzene analyses of rinse water and soil samples. Given this, please justify why test method SW846-8021B was used in lieu of SW846-8260 for these analyses.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tnrcc.state.tx.us
printed on recycled paper using soy-based ink

2. Section 2.2.1 (Boiler M-526) states that "daily operating and inspection records for Boiler M-526, dated August 9, 1993 through February 19, 1999 were reviewed to determine if there had been a historical release of organic heavies." Please note that in order for the review of the operating and inspection records to be considered complete, the records must include information and/or data from time the boiler began burning hazardous wastes up until the time the boiler burned its final volume of hazardous waste. Therefore, please revise Section 2.2.1 to include the dates that the boiler began and stopped burning hazardous waste.

   Please note that if the unit began burning hazardous waste prior to August 9, 1993 or stopped after February 19, 1999, the records search performed by Goodyear is considered incomplete. Given this, if Goodyear is unable to perform a complete operating and inspection records review to determine if there had been any releases during the life of the boiler (*i.e.*, period of time that the boiler burned hazardous waste), Goodyear must perform sampling and/or decontamination of the boiler containment area and the soil beneath the containment area.

3. Section 2.4 (Excavation of Stained Soil and Soil Analytical Results) states that a "composite soil sample" was obtained for a benzene analysis from an excavated area near a transfer pump. Please note that compositing of soil samples that contain volatile organic compounds (VOCs) is considered unacceptable due to the tendency of the VOCs to volatilize when combining samples. Therefore, since benzene is a VOC, Goodyear needs to re-perform the soil sampling (near the transfer pump) and analyses to determine the extent of the contamination in that area. Please note that the "extent of the contamination" is considered to be the area whereby the concentration for the constituents of concern exceed background levels. In addition, Goodyear should revise their CC report to provide the information required under 30 TAC §335.553(a).

4. The chain of custody form for rinse water sample "R-1" indicates that the pH check was not okay. Please explain how the pH being greater than 2 affected the benzene concentration results of the sample.

General Comments

1. Please note that since Goodyear is complying with Risk Reduction Standard No. 2 under 30 TAC §335 Subchapter S (Risk Reduction Standards) for soil remediation, Goodyear must also comply with the "Deed Certification" requirements of 30 TAC §335.560(b). Please note that the area described in 30 TAC §335.560(b)(2) is considered to be the contaminated area whereby the concentration for the constituents of concern exceed background levels.

whereby the concentration for the constituents of concern exceed background levels.

2. Please note that there are two sections labeled "Section 2.1." Please correct this error.

The information requested above is necessary for approval of your CC report. Therefore, please submit an original and two (2) copies of your revised report within 60 days from the date of this letter. Should you have any questions regarding this letter, please contact me at 512/239-1141, or if you will be responding by letter, be sure to use Mail Code 130 (MC-130).

Sincerely,

Stephen K. Akers, P.E.
Combustion Team 1
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Natural Resource Conservation Commission

SKA/fp

THE GOODYEAR TIRE & RUBBER COMPANY
BAYPORT CHEMICAL PLANT

UNUSUAL OCCURENCE REPORT

DATE: 3-8-92 TIME: 0630

I. OCCURENCE: Low Ph on V313 2.4
Low Ph on V211 5.0 - ULLAGE 13% HCl to Back 02 out

II. EVALUATION OF OCCURENCE:
CHECK APPROPRIATE BOX:

	YES	NO
WAS THERE EQUIPMENT FAILURE?		✓
WAS THERE AN INSTRUMENT FAILURE?		✓
DID THE ALARM SYSTEM SOUND?		✓
WAS THERE A POWER FAILURE?		✓
WAS HIGH TEMPERATURE INVOLVED?		✓
WAS HIGH LEVEL INVOLVED?		✓
WAS HIGH PRESSURE INVOLVED?		✓
DID AUTO S/D SYSTEM ACTIVATE?		✓
WAS OPERATOR ERROR EVIDENT?		
WAS THERE PRODUCT LOST?		✓
WAS THERE PERSONNEL INJURY?		✓
WAS THERE A SAFETY VIOLATION?		✓
WAS PROPER OPERATING PROCEDURE FOLLOWED?		✓
WAS THERE A FIRE?		✓

OTHER (DESCRIBE)

III. UNUSUAL OCCURENCE DESCRIPTION:
BE SPECIFIC USING ALL PERTINENET FACTS FROM SECTION II.
300 unit OPERATOR Took Ph sample First of SHIFT AND HAD A 2.4ph ON V313. This goes TO V211. SAMPLE V211 Ph. WAS 5. - ULLAGE went From 4% TO 10+ - Checked out 510 a 13% - SAMPLED Ph ON Cent. H2O 6.7 - R201Pd 6.4 - V213 11.5

IV. CORRECTIVE ACTION TAKEN: De's O2 Rate Lowest 8.27 - STOP B2 From V313 TO V211 - INC AMMONIA TO C302 - Bottle was not Dry - Got C302 O/H Ph up TO 9 AND START O/H TO V211 - V211 Ph up TO 8 Range

OPERATOR SIGNATURE (IF APPLICABLE) _____ DATE _____
SUPERVISOR SIGNATURE D E Rylund DATE 3-8-92

V. FOLLOW-UP ACTION: We NEED TO Catch Ph sample more THAN ONCE A SHIFT
Samples should be caught every 4 hrs to keep better control OF PH

PLANT MANAGER _____ DATE _____
MGR, PLANT OPER. _____ DATE _____
MAINT. SUPT. _____ DATE _____
SAFETY _____ DATE _____
PERSONNEL _____ DATE _____
PROD. FOREMAN _____ DATE _____

ENVIRON

Express Laboratories

401 N. 11TH. ST.
LA PORTE, TX 77571
281/471-0951 FAX:281/471-5821

LAW ENVIRONMENTAL, INC.

CORRECTIVE ACTION REPORT

METHOD OF BENZENE ANALYSIS FOR SAMPLES: "R-1", "TP-1", AND "STOCKPILE 1"

Facility: Goodyear Bayport

December 7, 2000

Project Name: Boiler Closure
Project No: 60160-9-7301
Sample: R-1 (92293.01)
The analysis for this sample, as plainly indicated on the Chain of Custody (COC), was for Benzene by Method SW846/8260B, Gas Chromatography /w Mass Spectrometer Detector (GCMS), not Benzene by Method SW846/8021B, Gas Chromatography /w Photoionization Detector (GCPID). However, the sample was inadvertently analyzed by Environ using the latter method. Both methods are acceptable for Benzene and with give the same result within experimental accuracy. This sample was run by SW846/8021B in duplicate and gave 0.001 mg/l on both analyses, above the reporting limit of <0.001 mg/l.

Project Name: V-411
Project No: 60160-9-7301.01
Sample: TP-1 (92662.01)
The Benzene analysis for this facility had previously specified Method SW846/8260B, however the COC did not specify the method and it was run by SW846/8021B, however, this oversight was corrected and the SPLP Extract was analyzed by SW846/8260B.

Project Name: V-411
Sample: Stockpile 1 (92663.01)
The Benzene and TCLP Benzene were run by SW846/8021B. The results would have been the same, within experimental accuracy, had SW846/8260B been the method used.

Submitted by:

John Keller Ph.D.
Lab Director/QC Manager

ENVIRON

Express Laboratories

401 N. 11TH. ST.
LA PORTE, TX 77571
281/471-0951 FAX:281/471-5821

LAW ENVIRONMENTAL INC.

CORRECTIVE ACTION REPORT

PRESERVATION OF SAMPLE: "R-1"

Facility: Goodyear Bayport

December 7, 2000

Project Name: Boiler Closure
Project No: 60160-9-7301
Sample: R-1 (92293.01)
There was a error made when logging-in this sample. The COC item: "pH Check OK" was marked "NO"' by the log-in clerk, rather than "NA" (Not Applicable), the proper designation. A pH check was not made at log-in time, therefore: "NA" instead of "NO", leaving open the possible meaning that the pH check was made and was not "OK", which was not the case.

The COC clearly states that the sample was received on ice and preserved with HCL, preservation Code: 2. In addition, the VOA was supplied by Environ pre-preserved w/HCL.

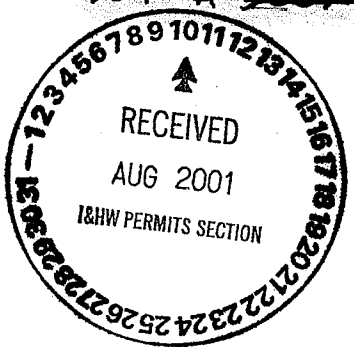
We apologize for the confusion caused on what should have been a very simple analysis.

Submitted by:

John Keller Ph.D.
Lab Director/QC Manager

SWR #30516

LAWGIBB GROUP



August 7, 2001

Mr. Stephen K. Akers, P.E.
Combustion Team 1, MC-130
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Natural Resource Conservation Commission
Post Office Box 13087
Austin, Texas 78711-3087

SUBJECT: NOTICE OF INTENT TO COMPLETE DEED RECORDATION FOR CLOSURE CERTIFICATION OF BOILER M-526/VESSEL V-411 AT THE GOODYEAR TIRE & RUBBER COMPANY BAYPORT CHEMICAL PLANT 13441 BAY AREA BOULEVARD PASADENA, TEXAS 77507

Dear Mr. Akers:

On behalf of The Goodyear Tire & Rubber Company Bayport Chemical Plant (Goodyear), Law Engineering and Environmental Services, Inc. expresses regret that filing a deed record for the closure of Boiler M-526 and Storage Vessel V-411, as required by the Closure Plan, was not completed within 90 days of acceptance of the Closure Certification Report (Document No. 4471) by the TNRCC.

The delay in filing the deed record was caused by circumstances beyond the control of Goodyear. Goodyear contracted with a State of Texas licensed surveyor to provide the required metes and bounds description of the portion of the property to be recorded. The surveyor performed the survey but failed to produce the required description, thereby preventing timely filing of the deed record. Goodyear has recently contracted with another surveyor to provide the metes and bounds description and anticipates completing the deed recordation before September 28, 2001.

Please accept our apology for this delay.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

Tim Ripstra
Project Manager

DOC NO. 5291-1
TEAM
☑ Combust Tm 1 ☐ 2 ☐ 3 ☐ 4
☐ UIC
COORDINATOR AKers
DUE DATE

G:\Projects (Sub-Divided by ORG #)\60160 - Environmental\Goodyear\Bayport\Deed Certification Delay Letter.doc

LAW Engineering and Environmental Services, Inc.
5500 Guhn Road • Houston, Texas 77040
713-939-8444 • Fax: 713-462-1653

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION ROUTE SLIP

Date: 8-14-01

TO: Central Records

FROM: C. Palomera

Building: Region:

Building: F Mail Code: MC-130

Division:

Division: Waste Permits

Section: MC-199

Section: Industrial & Hazardous Waste

Attachments(s) for:

- ☐ Information
- ☐ Review
- ☐ Comment/Response
- ☐ Approval
- ☐ Your Signature
- ☐ Signature of:

Comments:

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 14, 2001

Mr. T. T. Scruggs
Amoco Oil Company
P.O. Box 401
Texas City, TX 77592-0401

7000 0520 0023 2389 8706
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Amoco Oil Company
Land Treatment of K170 Waste
Industrial Solid Waste Registration No. 34507
Hazardous Waste Permit No. HW-50183
EPA I.D. No. TXD072181381
Document No. 5177-1

Dear Mr. Scruggs:

The Texas Natural Resource Conservation Commission (TNRCC) has received your letter dated July 17, 2001 addressing the concentration of applied K170 waste at your permitted land treatment unit. The K170 waste which did not meet the LDR's had been mistakenly placed in the LTU cells from August to October 2000. You had agreed to close 12 cells in which the K170 waste was placed and also close areas of other cells where the K170 waste was placed. You then proposed a sampling program to demonstrate that the K170 wastes had been adequately degraded to meet LDRs or background LTU cell levels.

Your sampling and analysis results indicate that the K170 waste concentrations have degraded to below background LTU levels. The 12 inactive cells and other areas were the K170 waste was placed may be returned to active service.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4.

Questions regarding this matter should be directed to Ms. Cynthia Palomares at 512/239-6079. Please be sure to use Mail Code MC130 when responding by mail.

Sincerely,

Enoch Johnbull. Supervisor
Facility Team IV, I&HW Permits Section
Waste Permits Division

EJ/CP/fp

cc: Ms. Cynthia Palomares

SWR# 30316

The Goodyear Tire & Rubber Company

13441 BAY AREA BOULEVARD
PASADENA, TX 77507

DOC NO. 4118-2
TEAM
X Combust Tm 1 ☐2 ☐3 X4
COORDINATOR ~~Johnson~~ Akers
DUE DATE 2/4/01

Mr. Stephen K. Akers, P.E.
Combustion Team 1, MC-130
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Natural Resource Conservation Commission
Austin Texas 78711-3087

SUBJECT: REQUEST FOR TIME EXTENSION
Technical Notice Deficiency for Closure Certification
Boiler M-526/Vessel V-411, dated November 27, 2000

Dear Mr. Akers:

January 23, 2001

The Goodyear Tire & Rubber Company (Goodyear) requests a 45-day extension to respond to the Technical Notice of Deficiency for Closure Certification (the Notice) issued on November 27, 2000. During the course of additional soil sampling in the vicinity of the transfer pump for Vessel V-411, performed to help resolve the deficiencies detailed in the Notice, soil containing benzene above levels considered to be protective of groundwater was encountered. Because of this discovery, additional excavation to remove and dispose the benzene-impacted soil is needed. However, this work can not be completed and the results reported within the 60-day time period required by the Notice. Please grant Goodyear an additional 45 days to complete the additional remediation described above. This extension will change the date on which the response is due from January 26, 2001 (60 days from November 27, 2000) to March 12, 2001 (105 days from November 27, 2000).

If you have any questions regarding this request, or require additional information regarding our closure activities to date, do not hesitate to contact me at 281-474-0044.

Sincerely,

Stephan R. Surofchek

Stephan R. Surofchek
Environmental Coordinator

DOC NO. 4552
TEAM
☑ Combust Tm 1 ☐ 2 ☐ 3 ☐ 4
☐ UIC
COORDINATOR Akers
DUE DATE

RECEIVED
NRCC IHW PERMITS
MAR 2 9 2001
WASTE PERMITS DIVISION

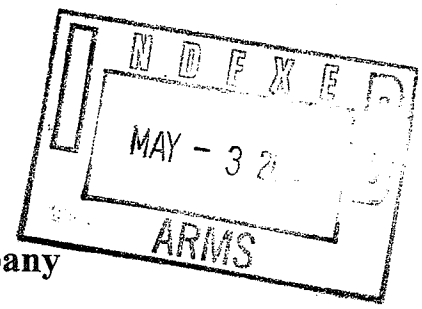
IHW 30316

V024

REVISED REPORT OF

RCRA HAZARDOUS WASTE MANAGEMENT UNIT CLOSURE

INDUSTRIAL BOILER M-526 AND STORAGE VESSEL V-411



PREPARED FOR:

The Goodyear Tire & Rubber Company
Bayport, Texas Chemical Plant

PREPARED BY:

Law Engineering and Environmental Services, Inc.
Houston, Texas

Revised, March 2001

GOODYEAR TIRE AND RUBBER COMPANY

6586949

IHW 000030316- Vol: 024

REPORT 2001 REVISED REPORT OF RCRA

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APPENDIX A Closure Plan - December 1999
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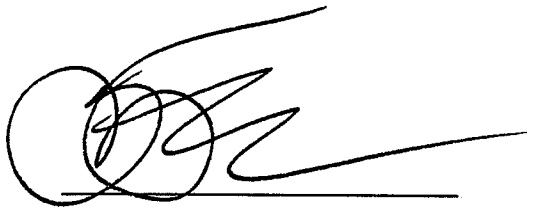
APPENDIX D Industrial Boiler M526 Burnout Temperature Records
APPENDIX E Soil Boring Logs
APPENDIX F Model Deed Certification Language

PROFESSIONAL ENGINEER'S CERTIFICATION OF CLOSURE

In my professional opinion, the closure of vessel V-411, boiler M-526, and the piping between them at The Goodyear Tire & Rubber Company Bayport Chemical Plant were closed substantially in accordance with the Closure Plan prepared by LAW Engineering and Environmental Services, Inc. (LAW), dated December, 1999. LAW has made visual inspections of the facilities that have been closed, and I, or someone under my supervision, observed the closure activities. A description of the work, which forms the basis for this certification, is included in the attached Closure Report.



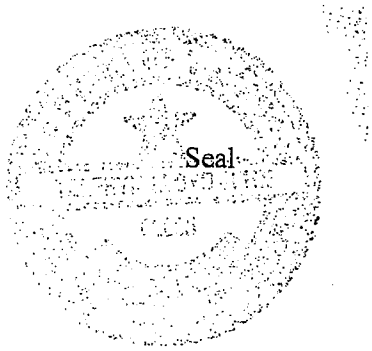
Signature

Telfryn L. John, P.E.
Name

3/7/01
Date

62665
Registration Number

Texas
State



Seal

OWNER/OPERATOR CERTIFICATION OF CLOSURE

I, Michael R Lockwood

(Owner/Operator)

of The Goodyear Tire & Rubber Company - Bayport, Texas Chemical Plant, 13441 Bay Area Boulevard, Pasadena, Texas

(Name and Address of Facility)

hereby state and certify that, to the best of my knowledge and belief, the boiler M-526, vessel V-411, and the piping between them have been closed in substantial accordance with the Closure Plan for these units prepared by LAW Engineering and Environmental Services, Inc. and dated December, 1999. The closure was completed on the 21st day of February 2001.

Michael R Lockwood	Michael R Lockwood
Name	Signature
Plant Manager	12 Mar 2001
Title	Date

1.0 INTRODUCTION

1.1 BACKGROUND INFORMATION

The Goodyear Tire & Rubber Company (Goodyear) Bayport Chemical Plant is located 13441 Bay Area Boulevard in Pasadena, Texas (Figure 1). Based on information provided by Goodyear, Boiler M-526 (Photograph 1) was used to burn wastes generated by the facility, including a by-product of the facility's hydroquinone manufacturing process. The by-product has historically been classified as a hazardous waste and as such, the boiler and the vessel used to store the by-product (V-411) have been operated as hazardous waste management units since January 1991 (Figure 2).

Goodyear has identified a viable use for the by-product from the hydroquinone process and began selling the by-product to an outside company in September 1999. As a result, Goodyear has designated the former by-product a co-product, thereby eliminating the hazardous waste classification. Goodyear has implemented activities to close boiler M-526 and Vessel V-411 (Photograph 2) in accordance with the Closure Plan dated December 2, 1999 (included as Appendix A of this document) that was approved by the Texas Natural Resource Conservation Commission (TNRCC) on December 17, 1999, and to fulfill the regulatory and reporting requirements for closure of hazardous waste incinerators and management units, as required by the TAC 335.118 and 40 CFR 265.112. Following closure as a hazardous waste unit, Boiler M-526 may be used to burn non-hazardous wastes as previously permitted in Permit Number 9582. Vessel V-411 will be used to store the co-product prior to off-site transport to the purchaser.

1.2 SCOPE OF WORK

LAW's scope of work consisted of observing and documenting the hazardous waste facility closure activities to verify compliance with the Closure Plan. LAW also inspected the secondary containment systems in the boiler and storage vessel areas for cracks or other defects that could have permitted a release of hazardous waste and to determine if soil sampling was required. LAW also obtained and analyzed a rinsate sample from the piping from Vessel V-411 to Boiler M-526. In addition, LAW obtained and analyzed soil samples, directed excavation of benzene impacted soil near the secondary containment area around the transfer pump used to move the contents of Vessel V-411 to the boiler, and performed soil sampling and analysis to determine the horizontal extent of benzene impacted soil.

Closure of Industrial Boiler M-526 consisted of a 'burnout', followed by sampling and analysis of ash from the boiler to document that hazardous levels of residual metals were not present in the boiler. The piping between the transfer pump from Vessel V-411 and the boiler was decontaminated with steam and water. After decontamination, water was circulated through the piping, and a sample was obtained and analyzed to document that no hazardous constituents remained in the piping. Because Vessel V-411 and the transfer pump will continue to be used to store and move the co-product, decontamination of this equipment was not performed. Details of the closure activities, inspections, and laboratory results are provided in Section 2.0

2.0 HAZARDOUS WASTE FACILITY CLOSURE

2.1 SUMMARY OF CLOSURE ACTIVITIES

The closure activities within the hazardous waste facility were conducted between November 1999 and February 2001. The general sequence of events associated with the closure is as follows:

- A burnout of industrial Boiler M-526 was performed on November 2, 1999. During this burnout, boiler temperatures from 1,567° F to 1,590° F were maintained for a period of five hours.

- The piping between the Vessel V-411 transfer pump and Boiler M-526 was decontaminated by circulating steam through the piping followed by a water rinse. The condensed steam and rinse water was placed in the hub drain inside of the Boiler M-526 containment area that routed the fluids to the plant's API separator and wastewater stripping tower. After decontamination, water was run through the piping from the pump to the piping termination at the fuel controls for Boiler M-526. A sample of piping rinse water (sample R-1) was obtained on April 11, 2000. Blind flanges were then installed on each end of the abandoned piping to prevent re-use.

- On April 11, 2000, LAW personnel performed a visual inspection of Boiler M-526 and Vessel V-411. The containment areas surrounding this equipment were also visually inspected. Before this inspection, LAW reviewed a visual internal inspection report of Boiler M-526 which was performed by Goodyear personnel on July 26, 1999 and an Inspection Report dated July 2, 1996 which contained ultra-sonic thickness reading of various components of Boiler M-526. Daily operating and inspection records for Boiler M-526, dated August 9, 1993 through February 19, 1999 were reviewed to determine if there had been an historical release of organic heavies. Goodyear field notes, recorded during the installation of the high-density polyethylene liner around Vessel V-411 in May 1991, were also reviewed. In addition, the containment area around the transfer pump was also visually inspected. Soil staining was noted north of the Vessel V-411 transfer pump containment area.

- On May 18, 2000, during a shut-down of Boiler M-526, a sample of the ash-like residue in the combustion chamber of Boiler M-526 was obtained and submitted for laboratory analysis in accordance with the Closure Plan.

- On July 18, 2000, LAW personnel obtained composite soil sample TP-1 from the bottom and sidewalls of a small excavation made adjacent to the transfer pump from vessel V-411 to determine if organic heavies were present at levels above the closure criteria. LAW also obtained a composite sample (sample Stockpile 1) of the excavated soil for disposal characterization purposes.

- Based on the results of the July 18, 2000 soil sampling event, additional soils were excavated on July 20, 2000. Composite soil sample TP-2 was obtained from the bottom and sidewalls of the completed excavation.

- After receipt and review of the laboratory analytical results for sample TP-2, the excavation was backfilled with clean soil from an off-site source.

- Approximately 20 cubic yards of excavated soil was disposed at Browning-Ferris Industries' Anahuac, Texas Landfill on August 17, 2000. A copy of the transportation manifest for the soil disposal is included in Appendix B of this document.

- On January 10, 2001 soil borings were installed and soil samples obtained and analyzed to delineate the horizontal extent impacted soil (borings BH-1, BH-2, BH-3, and BH-4). In addition, a soil boring (BH-5) was installed in the previously excavated area to verify the laboratory results for sample TP-2 and to help delineate the horizontal extent of impacted soil. Soil contaminated above the closure criteria was found at a depth of ten feet below the ground surface (BGS) in soil boring BH-5.

- On January 10, 2001, Unusual Occurrence Reports, dated from January 1991 through December 1993 and daily operating and inspection records for Boiler M-526, dated February 20, 1999 through September 1999 were reviewed to determine if there had been an historical release of organic heavies.

- On February 1, 2001 approximately 12 additional cubic yards of soil was excavated from the area north of the transfer pump (boring BH-5 location) to remove soil contaminated above the closure criteria level. Five discrete soil samples were obtained from the walls and bottom of the excavation.

- The soil excavated on February 1, 2001 was disposed at Browning-Ferris Industries' Anahuac, Texas Landfill on February 21, 2001. A copy of the transportation manifest for the soil disposal is included in Appendix B of this document.

2.2 RINSATE SAMPLING RESULTS

Environ Express Laboratories in LaPorte Texas, analyzed sample R-1, obtained from the piping from the V-411 transfer pump to Boiler M-526 on April 11, 2000, for the chemical of concern, benzene, using EPA Method SW846/8021B. Although the Closure Plan indicated that the sample would be analyzed by EPA Method SW846/8260, the sample was by EPA Method SW846/8021B. However, the use of EPA Method SW846/8021B did not affect the accuracy of the results. Please refer to the laboratory's Report of Corrective Action for Samples "R-1", "TP-1", and "Stockpile 1", presented in Appendix C of this report.

The benzene concentration in sample R-1 was determined to be 0.001 milligrams per liter (mg/l). This result was compared to the toxicity characteristic concentration for benzene, 0.5 mg/l, found in 40 CFR 261.24, Table 1. Because the benzene concentration found in sample R-1 was less than the toxicity characteristic concentration, the piping was considered to have been adequately decontaminated. The laboratory analytical results can be found in Appendix C of this report.

2.3 VISUAL INSPECTION OF CONTAINMENT AREAS

LAW visually inspected the concrete containment around Boiler M-526, Vessel V-411, and the transfer pump from V-411.

2.3.1 Boiler M-526

The concrete containment around Boiler M-526 was found to be adequately curbed and sloped to assure that a release would be directed to the hub drain leading to the Plant's API separator. No cracks or unsealed joints were observed that would allow a release to the subgrade to occur. The daily operating and inspection records for Boiler M-526, dated August 9, 1993 through September 1999 and the Plant's Unusual Occurrence Reports, dated from January 1991 through December 1993, were reviewed to determine if there had been an historical release of organic heavies. Notations regarding small leaks at connections and valves were noted. In each case, the leaks were promptly repaired and the released organic heavies promptly cleaned up from the containment area. No evidence of a substantial release from the boiler was found in the records that were reviewed.

2.3.2 Vessel V-411

The secondary containment area associated with Vessel V-411 is constructed of reinforced concrete. Vessel V-411 is constructed on a ring-wall foundation within the containment system. In May 1991, the secondary containment system was lined with 80-millimeter thick high-density

polyethylene (HDPE). As part of the closure activities, the containment area around Vessel V-411 was observed for cracks, tears, or worn areas in the 80-mil HDPE secondary containment liner (Photograph 3). No areas of concern were noted.

Notes regarding observations made by Goodyear personnel during the May 1991 liner installation were also reviewed as part of the closure activities to determine if environmental or integrity concerns were noted and documented. During the liner installation, vessel V-411 was removed from the containment area, thereby exposing the ring-wall foundation and the sandy fill material beneath Vessel V-411 (i.e., inside the ring-wall foundation). Goodyear's notes indicated that the soil beneath Vessel V-411 was a "sand foundation capped with a layer of approximately 8 to 12 inches of what seems to be stabilized sand...There does not appear to be any contamination of the sand under the tank." The liner installation was completed and Vessel V-411 was reinstalled. The original liner was not extended to the top of the secondary containment walls. The HDPE liner was subsequently extended to completely cover the containment area walls in January 1998.

2.3.3 Transfer Pump

The concrete containment around the transfer pump was visually inspected and found to be adequately curbed to prevent a release of organic heavies to the surrounding soil. No cracks or erosion of the concrete containment were found. However, evidence of staining was noted in an area near the north side of the containment area for transfer pump. This staining appeared to be the result of handling transfer hoses outside of the containment area.

2.4 BOILER M-526 BURNOUT, RESIDUE SAMPLING, AND ANALYTICAL RESULTS

On November 2, 1999, a burnout of residual organic heavies from Boiler M-526 was performed. During this burnout, boiler temperatures from 1,567° F to 1,590° F were maintained for a period of five hours. A copy of the automated firebox temperature records during the burnout is provided in Appendix D of this document.

On May 18, 2000, during a shutdown of Boiler M-526, a sample (sample Firebox 1) of the ash-like residue in the combustion chamber of Boiler M-526 was obtained and submitted for analysis to determine if residual levels of the indicator metal were present above the closure criteria. The sample was obtained after the boiler had cooled down enough to access the combustion chamber. A long-handled steel cup was used to scrape residue from the firebox sidewalls. This residue was

then placed in a laboratory supplied glass jar and transported to the laboratory for analysis. The sample was analyzed for TCLP silver using EPA Methods SW846.1311 and SW846.6010B. The result was 0.25 mg/l. This result was compared to the toxicity characteristic concentration for silver, 5.0 mg/l, found in 40 CFR 261.24, Table 1. Because the result was less than the toxicity characteristic concentration for silver, the residual material in the combustion chamber was considered clean per the Closure Plan, and additional decontamination was not warranted. The analytical results for sample Firebox 1 can be found in Appendix C of this document.

2.5 EXCAVATION OF STAINED SOIL AND SOIL ANALYTICAL RESULTS

During the visual inspection of the containment around the transfer pump, some stained soil was noted adjacent to the north side of the transfer pump containment area. Handling transfer hoses outside of the containment area apparently caused these stains. Approximately 14 cubic yards of soil were excavated from this area (Photograph 4) and a composite soil sample of the excavation sidewalls and bottom (sample TP-1) was obtained on July 18, 2000. Sample TP-1 was analyzed for total benzene using EPA Method SW846.8021B and SPLP benzene using EPA Method 8260B. The total benzene result was 1.70 milligrams per kilogram (mg/kg) and the SPLP benzene result was 41 micrograms per liter (µg/l). Because the total benzene concentration exceeded the Texas Risk Reduction Standard No. 2 (RRS No. 2) for ground-water protection at industrial sites (0.5 mg/kg), further excavation of impacted soil was performed.

An additional six cubic yards of soil was removed on July 20, 2000 and a composite sample of the enlarged excavation sidewalls and bottom was obtained (sample TP-2). The total benzene result was 0.280 milligrams per kilogram (mg/kg) and the SPLP benzene result was 13 micrograms per liter (µg/l). Because the total benzene concentration was less than the RRS No. 2 for ground-water protection at industrial sites, further excavation of impacted soil was not warranted. The excavation was then backfilled with new clean soil.

A composite sample of the excavated soil was obtained for disposal characterization purposes (sample Stockpile 1). This sample was analyzed for total benzene using EPA Method SW846.8021B, TCLP benzene using EPA Methods SW846.1311 and SW846.8021B, and total petroleum hydrocarbons (TPH) using EPA Method 418.1. The total benzene result was 9 mg/kg. The TCLP benzene concentration was 0.49 mg/l. The TPH result was 889 mg/kg. The laboratory analytical results for soil samples TP-1, TP-2, and Stockpile 1 can be found in Appendix C of this report. The approximately 20 cubic yards of excavated soil was characterized as a Class I non-

hazardous waste and transported to Browning-Ferris Industries' Anahuac, Texas landfill on August 17, 2000 for disposal. A copy of the transportation manifest is included in Appendix B of this report.

During the review of the original version of this report, issued in September 2000, Mr. Stephen K. Akers, of the TNRCC, questioned the validity of composite sample TP-2 in his Technical Notice of Deficiency for Closure Certification (Boiler M-526/Vessel V-411), dated November 27, 2000. On January 10, 2001 five soil borings (BH-1 through BH-5) were installed using direct-push methodology in and around the excavated area. Soil borings BH-1 through BH-4 were installed around the excavated area and are discussed in Section 2.6 of this report. Soil boring BH-5 was located in the previously excavated area to verify the laboratory results for sample TP-2 and help determine the vertical extent of impact. The locations of soil borings BH-1 through BH-5 are shown in Figure 3.

Two discrete soil samples were obtained from boring BH-5. The first (sample BH-5 (5')) was obtained at a depth of five feet below the ground surface (BGS), where native soil beneath the backfill, placed in July 2000, was encountered. The benzene concentration in sample BH-5 (5') was determined to be 0.200 mg/kg, similar to the benzene concentration of 0.280 mg/kg found in sample TP-2. The second sample from boring BH-5 was obtained at 10 feet BGS (sample BH-5(10')), the boring termination depth. The benzene concentration in sample BH-5(10') was determined to be 0.650 mg/kg. Sample BH-5(10') was also subjected to SPLP extraction and analysis for benzene. The result of the SPLP analysis was 0.008 milligrams per liter (mg/l). Because the total benzene concentration in sample BH-5(10') exceeded the Texas Risk Reduction Standard No. 2 for ground-water protection at industrial sites (0.5 mg/kg), and the SPLP benzene concentration exceed the Texas Risk Reduction Standard No. 2 for ground-water (0.005 mg/l), further excavation of impacted soil was needed.

On February 1, 2001 the soil boring BH-5 area was excavated to a depth of eleven feet. Discrete soil sample Bottom @ 11' was obtained from the bottom of the excavation. The soil exposed along the four walls of the excavation was screened at approximately two foot intervals with a photo-ionization detector (PID), calibrated with a 100 parts per million isobutylene standard. A discrete soil sample was obtained from each of the four walls at the elevation that exhibited the highest PID reading. The east wall was sampled at 8 feet BGS (sample E. Wall @8'). The samples from the

south, west, and north walls were obtained at depths of 7 feet BGS (samples S. Wall @7', W. Wall @7', and N. Wall @7', respectively). The following table summarizes the benzene concentration in these five samples:

Sample ID	Date Sampled	Benzene Concentration (mg/kg)
Bottom @ 11'	February 1, 2001	0.048
E. Wall @ 8'	February 1, 2001	0.045
S. Wall @ 7'	February 1, 2001	<0.010
W. Wall @ 7'	February 1, 2001	<0.010
N. Wall @ 7'	February 1, 2001	0.084

Because the benzene concentration in the samples from the walls and bottom of the excavation were less than Texas Risk Reduction Standard No. 2 for ground-water protection at industrial sites (0.5 mg/kg), further excavation of benzene impacted soil was not needed.

The approximately 12 cubic yards of soil excavated on February 1, 2001 was placed into a roll-off box and a composite sample (sample Stockpile 2) was obtained for disposal characterization purposes. Sample Stockpile 2 was analyzed for TPH using Method TX 1005 and total benzene using EPA Method SW846-8260B. The TPH concentration is sample Stockpile 2 was determined to be < 50 mg/kg, the total benzene concentration was 0.013 mg/kg. The soil was transported Browning-Ferris Industries' Anahuac, Texas Landfill on February 21, 2001. A copy of the transportation manifest for the soil disposal is included in Appendix B of this document.

2.6 EXTENT OF CONTAMINATION LEFT IN PLACE

To determine the extent of contamination left in place soil borings (borings BH-1, BH-2, and BH-3) were installed to the north, west, and south of the excavated area using direct-push methodology (Figure 3). Delineation to the east of the excavation was not possible due to the presence of the concrete containment structure for Vessel V-411. The locations of the approximately 10 foot deep borings are shown on Figure 3. The descriptions of the soil types encountered in the borings are shown on the soil boring logs, presented in Appendix E of this report.

The soil borings were sampled continuously and screened for volatile organic vapors using a calibrated PID. The sample interval showing the greatest PID reading (if any) was selected for sampling. If no volatile organic vapors were detected with the PID in a boring, the deepest sample was selected for laboratory analysis. Because the sample from boring BH-1 at 4 feet BGS had a

PID reading of 66 ppm, another boring (BH-4) was installed further to the north from the excavation. The samples were submitted to the laboratory for total benzene analyses using EPA Method SW846/8260B.

The total benzene concentration in the samples from borings BH-2, BH-3, and BH-4 were less than the laboratory practical quantitation limit (PQL), of 0.010 mg/kg, for these analyses. Based on these results, LAW has estimated the boundary of the benzene contamination to be approximately half way between locations known to be impacted with benzene and locations known to be not impacted with benzene. Therefore, the limits of the benzene contamination are approximately 18 feet east, 11 feet west, 47 feet north, and 26 feet south of the source area, as shown in Figure 4.

To comply with the deed certification requirements of 30 TAC 335.560(b)(2), Goodyear will contract with a State of Texas licensed Land Surveyor to determine the metes and bounds of the benzene contaminated soil area shown in Figure 4. Goodyear will permanently record the location of the remaining benzene-impacted soil with the deed for the property, using the language presented in the Sample Deed Certification found in Appendix F of this report.

3.0 CONCLUSIONS

Based on our review of daily operating records of Boiler M-526 and Unusual Occurrence Reports; documentation of observations made by Goodyear personnel during the installation of the HDPE secondary containment for Vessel V-411; and our visual inspection of the containment areas around Boiler M-526, Vessel V-411, and the transfer pump; LAW concludes that a release of organic heavies, from Boiler M-526 and Vessel V-411, to the environment has not occurred, with the exception of the area north of the transfer pump. The soil impacted by organic heavies, with benzene concentrations exceeding the Texas Risk Reduction Standard No. 2 for ground-water protection at industrial sites was removed and appropriately disposed. However, some soil with benzene concentrations below the Texas Risk Reduction Standard No. 2 for ground-water protection at industrial sites remains in place.

The horizontal limits of the benzene-impacted soil have been delineated to the laboratory PQL for the analyses performed. The vertical limit of the benzene-impacted soil has been defined to the Texas Risk Reduction Standard No. 2 for ground-water protection at industrial sites. Within 90 days of acceptance of this Closure Report by the TNRCC, Goodyear will permanently record the

location of the remaining benzene-impacted soil with the deed for the property, using the language presented in the Sample Deed Certification found in Appendix F of this report.

Based on the analytical results presented in this report, LAW concludes that no hazardous concentrations of organic heavies remain in the combustion chamber of Boiler M-526; in the piping from the transfer pump to Boiler M-526; or in or around the containment areas of Boiler M-526, the transfer pump, and vessel V-411.

Therefore, LAW concludes that the closure of Industrial Boiler M-526 and Storage Vessel V-411 was performed in accordance with the approved December 1999 Closure Plan. Waste materials generated as part of the closure activities were managed in accordance with the Closure Plan and were either disposed at an approved industrial solid waste management facility, or in the case of decontamination fluids, were treated on site.

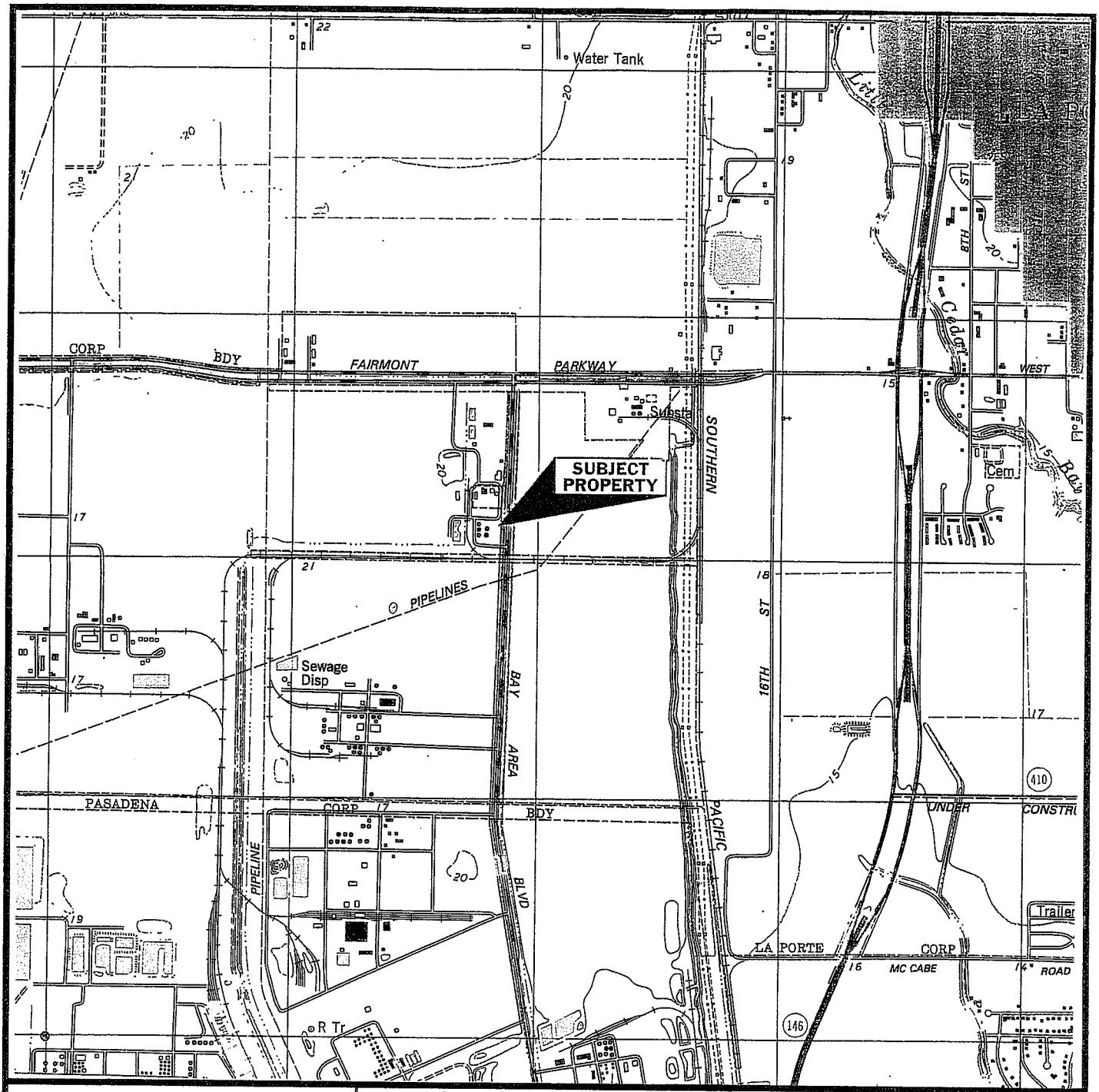
FIGURES

Figure 1 – Site Location Map

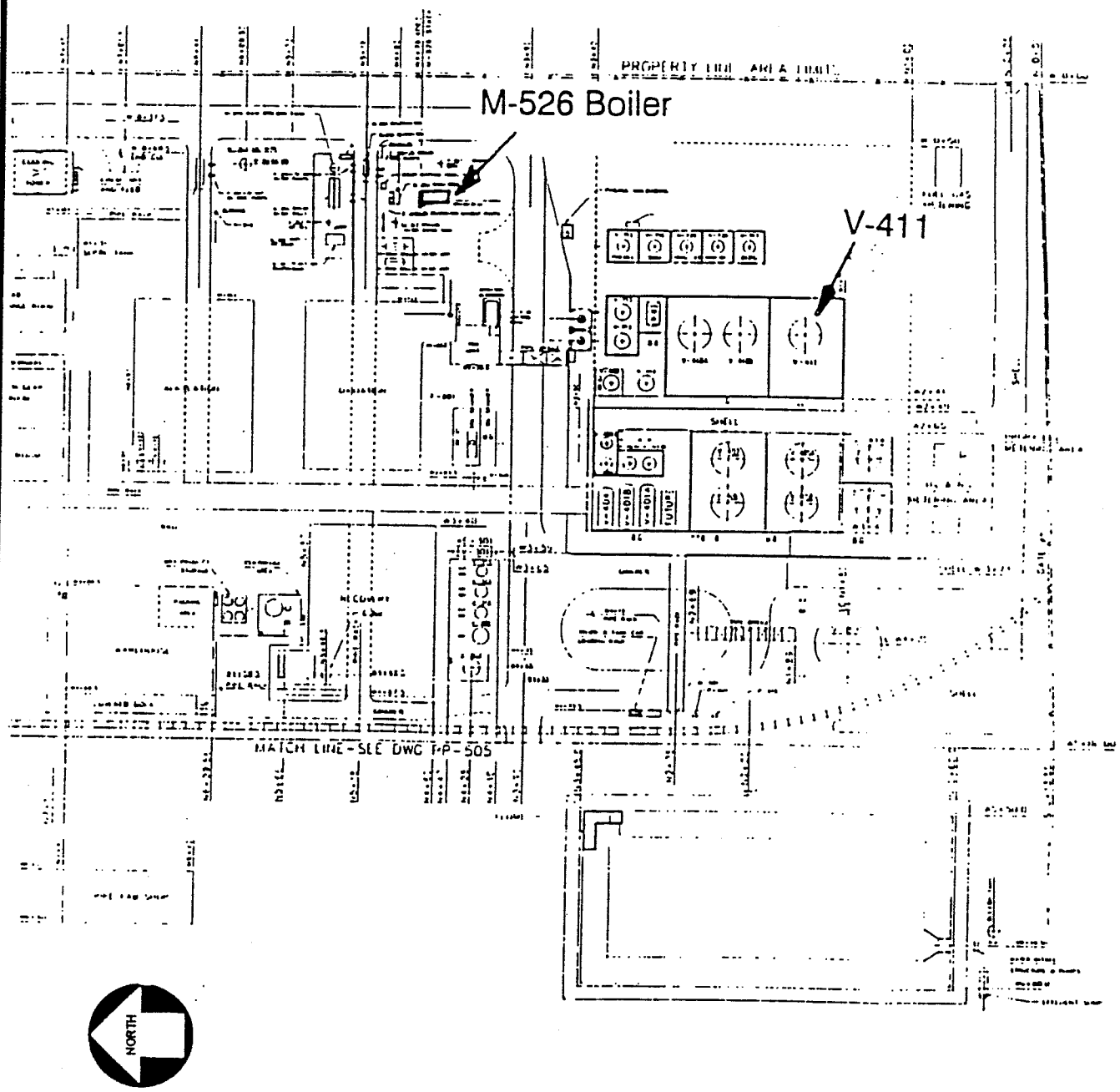
Figure 2 – Site Plan

Figure 3 – Soil Boring Locations

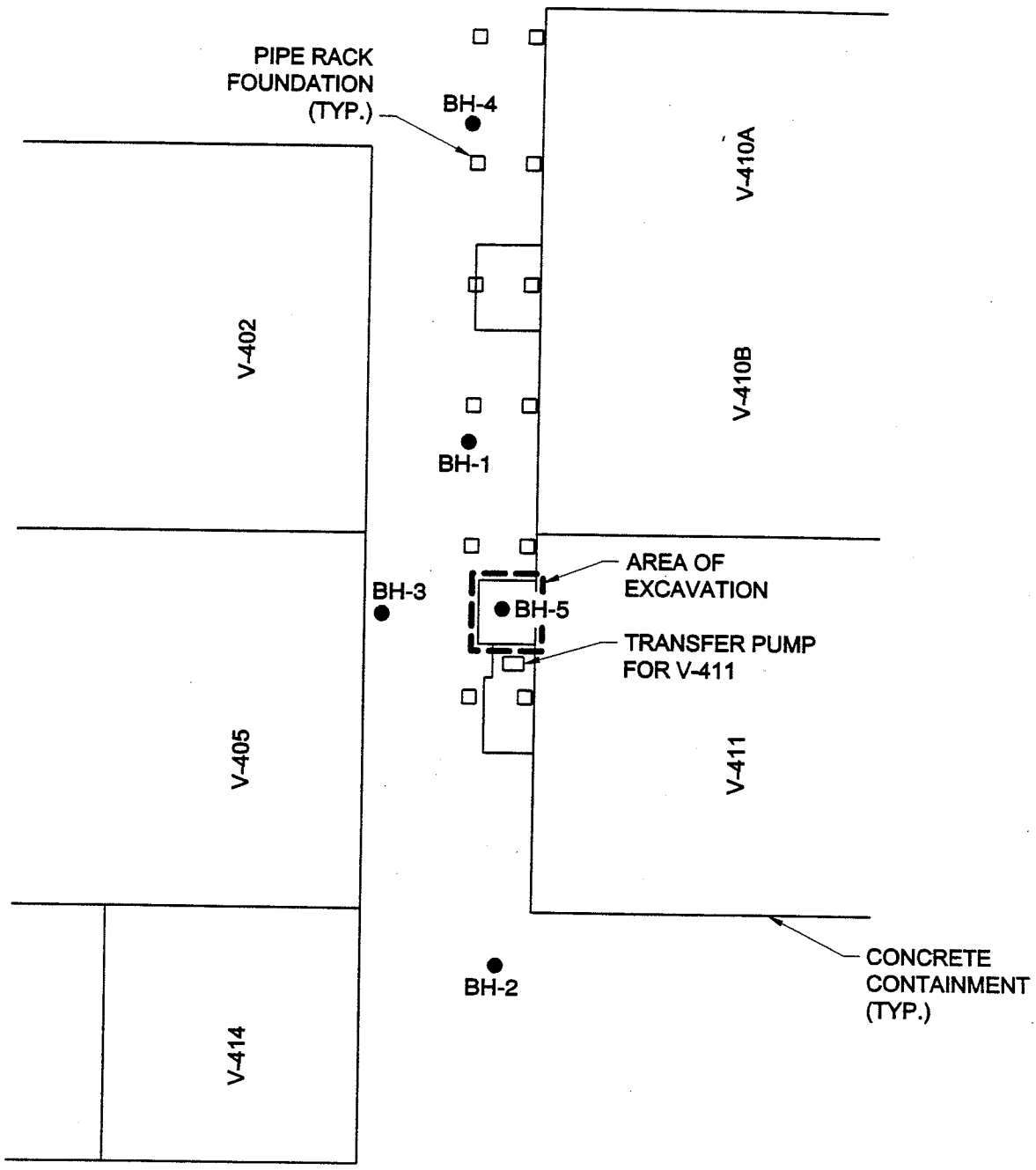
Figure 4 – Horizontal Extent of Benzene Impacted Soil



N	**Approximate Scale:** 1 : 24,000	
THE GOODYEAR TIRE & RUBBER COMPANY **Bayport Chemical Plant** GOODYEAR *LAW Project 60160-9-7301.01*	LAWGIBB GROUP	**Figure 1 Site Location Map** Source: U.S.G.S. 7.5 Minute Series Topographic Map of the La Porte, Texas Quadrangle. Prepared By: Checked By:



	Approximate Scale: **1 : 1,800**	
THE GOODYEAR TIRE & RUBBER COMPANY Bayport Chemical Plant GOODYEAR *LAW Project 60160-9-7301.01*	LAWGIBB GROUP	**Figure 2 Site Plan** Source: Metcalf & Eddy, 1991 Prepared By: Checked By:



LEGEND

● BH-2 SOIL BORING LOCATION

12.5' 0 12.5' 25' 37.5' 50' 62.5'

APPROXIMATE SCALE IN FEET
1" = 25'

SOURCE: FIELD NOTES & OBSERVATIONS

DRAWN BY M.A.D. DATE 02/27/01

CHECKED BY T.R. PRINCIPAL/DATE 3/6/01

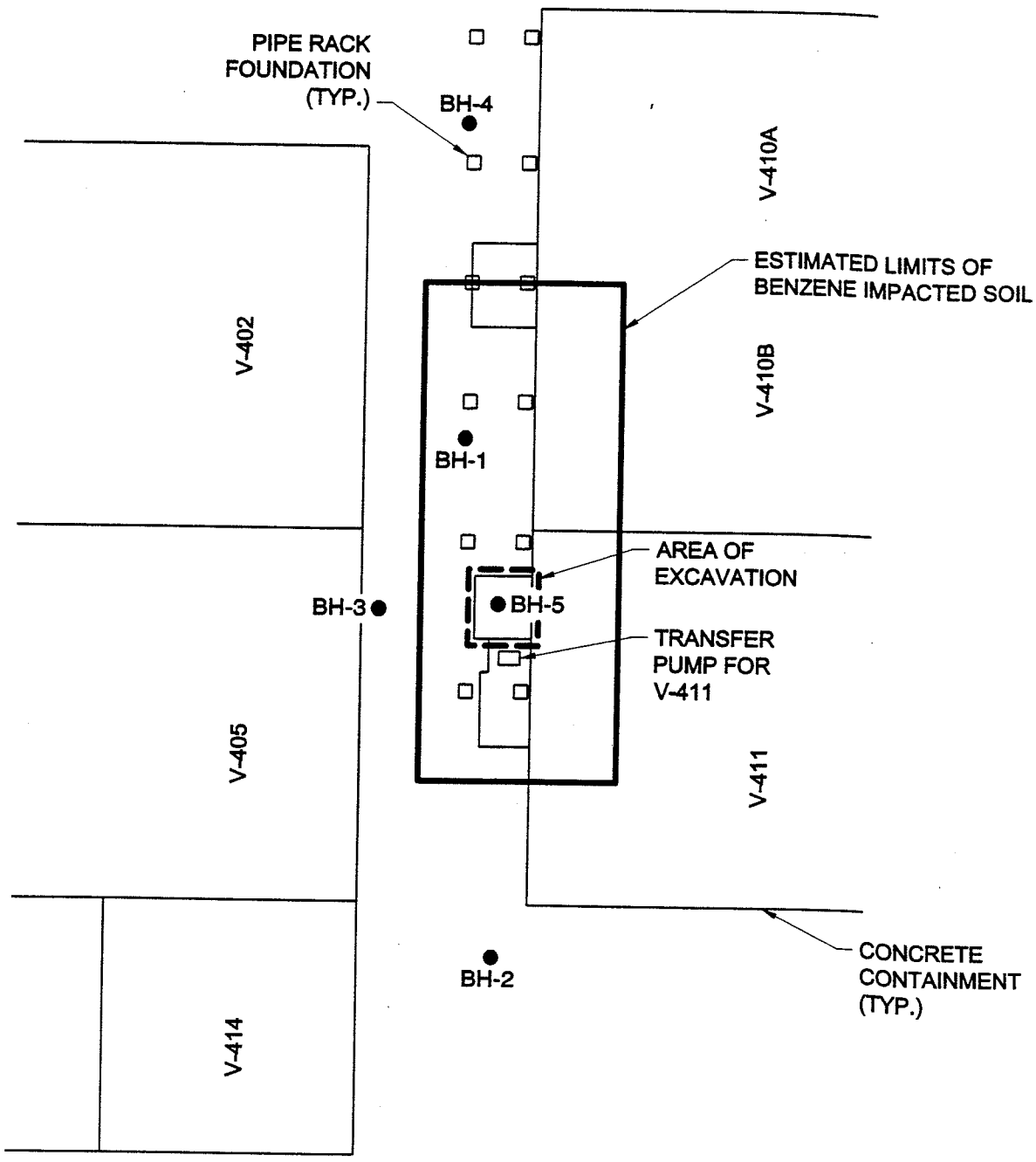
NORTH

LAW PROJECT NO. 60160-9-7301 PHASE 02 TASK **

DRAWING/FILE NO. 7301-01.DWG REV. - SCALE 1"=25'

LAWGIBB GROUP
5500 GUHN ROAD
HOUSTON, TEXAS 77040
Tel. 713-939-8444 Fax. 713-462-1653

THE GOODYEAR TIRE & RUBBER COMPANY
HOUSTON CHEMICAL PLANT
HOUSTON, TEXAS
FIGURE 3
SOIL BORING LOCATION MAP



LEGEND

● BH-2 SOIL BORING LOCATION

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SOURCE: FIELD NOTES & OBSERVATIONS

DRAWN BY M.A.D. DATE 02/27/01
CHECKED BY T.R. PRINCIPAL/DATE TMS 3/6/01

NORTH

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THE GOODYEAR TIRE & RUBBER COMPANY
HOUSTON CHEMICAL PLANT
HOUSTON, TEXAS
FIGURE 4
HORIZONTAL EXTENT OF BENZENE IMPACTED SOIL

APPENDIX A

Closure Plan – December 1999

FILE COPY

LAWGIBB GROUP

CLOSURE PLAN

FOR

INDUSTRIAL BOILER M-526
AND
STORAGE VESSEL V-411

AT THE

THE GOODYEAR TIRE & RUBBER COMPANY
BAYPORT CHEMICAL PLANT
13441 BAY AREA BOULEVARD
PASADENA, TEXAS

Prepared for:

THE GOODYEAR TIRE & RUBBER COMPANY
BAYPORT CHEMICAL PLANT
13441 BAY AREA BOULEVARD
PASADENA, TEXAS

GOODYEAR

Revised: December 1999

Prepared by:
Law Engineering and Environmental Services, Inc.

Project 60160-9-7301.01

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1.0 INTRODUCTION

This Closure Plan is submitted in accordance with the requirements of the Texas Natural Resource Conservation Commission (TNRCC) regulatory and reporting requirements for closure of hazardous waste incinerators and waste management units used to store hazardous wastes, as described in 32 Texas Administrative Code (TAC) 335.118 and 40 Code of Federal Regulations (CFR) 265.112. This Closure Plan presents the activities required to close the industrial boiler M-526 and storage vessel V-411 at The Goodyear Tire & Rubber Company (Goodyear) Bayport Chemical Plant in Pasadena, Texas. The contents of this Closure Plan are also consistent with TNRCC Closure Guidance No. 6- Closure Requirements for Interim Status Hazardous Waste Incinerators and U.S. Environmental Protection Agency (EPA) regulations regarding the content of closure plans for interim status facilities (40 CFR 265, Subpart G).

It is Goodyear's intent to close boiler M-526 and vessel V-411 in a manner that is protective of human health and the environment and that minimizes, if not eliminates, the need for further maintenance and controls to the degree possible under the governing regulations. Goodyear will maintain an on-site copy of the approved Closure Plan until the certification of closure has been submitted to and accepted by the TNRCC Office of Waste Management.

Upon completion of the closure, Goodyear will submit to the TNRCC a certification by both Goodyear and an independent professional engineer registered in the State of Texas. The certification will state that the facility has been closed in accordance with the approved Closure Plan. A Closure Documentation Report will be submitted with the certification.

2.0 BACKGROUND INFORMATION

Based on information provided by Goodyear, boiler M-526 is used to burn wastes generated by the facility, including a by-product of the facility's hydroquinone manufacturing process. The by-product has historically been classified as a hazardous waste and as such, the boiler and the vessel used to store the by-product (V-411) have been operated as hazardous waste management units.

Goodyear has identified a viable use for the by-product from the hydroquinone process and has made arrangements to sell the by-product to an outside company. As a result, the TNRCC has approved a redesignation of the by-product to a co-product, thereby eliminating the hazardous waste classification. Goodyear intends to close boiler M-526 and vessel V-411 to fulfill the regulatory and reporting requirements for closure of hazardous waste incinerators and management units, as required by the TAC 335.118 and 40 CFR 265.112. Following closure as a hazardous waste unit, boiler M-526 may be used to burn non-hazardous wastes as previously permitted. Vessel V-411 will be used to store the co-product prior to off-site transport to the purchaser.

3.0 FACILTY DESCRIPTION AND HISTORY

The Goodyear Bayport Chemical Plant is located at 13422 Bay Area Boulevard in Pasadena, Texas. The Goodyear Tire & Rubber Company, 1144 East Market Street Akron, Ohio 44316 is the facility owner.

The Bayport plant operates under U.S. EPA ID Number TXD074185141 and TNRCC registration Number 30316. Mr. Stephan R. Surofchek (phone: (281) 747-0044/facsimile: (281) 474-0028) is the designated site contact.

3.1 FACILITY LOCATION AND SUROUNDINGS

The plant is located at the southwest corner of Bay Area Boulevard and Fairmont Parkway (Figure 1) in the City of Pasadena in Harris County, Texas. The facility is on a 75-acre tract located in the Richard Pearsall 1/3 League, Abstract Number 625, and lies within the limits of the Bayport Industrial District.

The site is bordered primarily by chemical manufacturing firms. Three parallel easements form the southern boundary. These easements, a 50-foot railroad right-of-way, a 35-foot pipeline easement, and a Houston Lighting and Power easement separate the Goodyear Plant from a Lubrizol Corporation chemical plant. A residential subdivision is located approximately 3,000 feet northwest of the Goodyear property.

3.2 SITE HISTORY

Signal Chemical Company reportedly constructed the Bayport Chemical Plant in 1970 and briefly operated the plant. The plant was subsequently sold to Big Three Industries. Goodyear purchased the facility in 1974 after leasing the plant for several years. Plant personnel report that the site was possibly used for rice farming before 1970.

3.3 DESCRIPTION OF THE PLANT PROCESS

The plant produces hydroquinone, acetone, and other specialty chemicals used within Goodyear operations. Acetone is a co-product stream from the hydroquinone process. Some of the acetone is used in the primary process at the plant, hydroquinone production, and the remaining acetone is sold to other companies.

The hydroquinone manufacturing process has three main steps consisting of alkylation, oxidation, and recovery. The raw materials are mixed and run through an alkylation and trans-alkylation process to form an intermediate product. The intermediate product is then combined in a reactor with water, caustic soda, other raw materials and a recycle stream from the reactor. Oxidation occurs in the reactor to create a second intermediate product, which is then purified via centrifuging and crystallization. After purification, the second intermediate product is recovered by rotary vacuum filtration, re-slurried with acetone, and reacted with the other chemicals in the reactor to yield hydroquinone and acetone.

A by-product of this process (methanol and organic heavies) is stored in V-411. The material stored in V-411 has historically been designated as D001/D018 listed hazardous waste and burned in boiler M-526. The by-product has recently been reclassified as a co-product, thereby eliminating the former hazardous waste classification. Goodyear is selling the co-product to an outside company and has discontinued burning the co-product.

3.4 DESCRIPTION OF BOILER M-526 AND VESSEL V-411

The M-526 boiler to be closed is located in the east central section of the production area of the Bayport plant, as shown in Figure 2. Technical specifications for the boiler are included in Appendix A of this Closure Plan. Additional information regarding the boiler is included in tables from the facility's Part A permit application. The tables are provided in Appendix A. The boiler, vessel V-411, and the oil lines near the boiler were inspected daily before burning of the co-product was discontinued. An example of a Daily BIF Inspection Report is provided in Appendix A.

Vessel V-411 is a sealed steel tank, with an approximate capacity of 88,000 gallons. Specific information regarding vessel V-411 is provided in the tables from the Part A Permit Application that can be found in the Appendix A of this Closure Plan.

Storage vessel V-411 is used to store methanol and organic heavies from the hydroquinone manufacturing process described in Section 3.3. The vessel has been managed as a less than 90-day storage tank. The vessel is located within a concrete secondary containment system that is lined with 80 millimeter-thick high-density polyethylene (HDPE). A leak detection system is located within the vessel's ring wall foundation. The vessel is included in the plant's mechanical integrity inspection program. Copies of the March 1995 visual inspection and the July 1995 ultra-sonic thickness testing are provided in Appendix B.

4.0 CLOSURE PLAN

4.1 CLOSURE PERFORMANCE STANDARD

This Closure Plan is designed to achieve closure of boiler M-526 and vessel V-411 in a manner that minimizes, if not eliminates, the need for maintenance. Closure activities are designed to control and minimize or eliminate hazardous constituents and to prevent them from becoming a threat to human health or the environment. Closure will not be performed until approval of the Closure Plan has been obtained from the TNRCC Industrial and Hazardous Waste Permits Section.

4.2 MAXIMUM WASTE INVENTORY

Because the contents of vessel V-411 and associated piping have been reclassified as a co-product, the contents will not require disposal as a hazardous waste. An estimated 100 gallons of condensed steam and equipment decontamination fluids may be collected and contained as a result of closure activities, and these fluids will need to be disposed appropriately. If contaminated concrete and/or soil are found during closure this material may require removal and may be classified as a hazardous waste. If removed, this solid material will need to be containerized, characterized and disposed in accordance with applicable regulations. It is anticipated that no soil/or concrete will need to be removed. Therefore, no soil and/or concrete waste is included in the maximum waste inventory.

4.3 CLOSURE PROCEDURES

4.3.1 Boiler M-526

Boiler M-526 will remain in service after closure. However, the boiler will no longer be used to burn the reclassified waste (i.e., co-product stored in V-411). The organic heavies stored in V-411 and historically burned in boiler M-526 is an organic mixture that does not contain BIF metals. The material safety data sheet (M.S.D.S.) for the co-product is provided in Appendix C. Complete combustion of this organic waste is expected to have occurred in the boiler. To assure complete combustion, a burnout fueled by natural gas and vent gas only will be performed for at least four hours at a minimum temperature of 1,546 degrees Fahrenheit, the temperature demonstrated during the most recent certification test. After the burnout, a sample will be obtained of the residual material present in the boiler combustion chamber. The sampling procedures are described in Section 4.3.4 of this Closure Plan.

If the combustion chamber residual material is determined to be hazardous (i.e.: the indicator metal concentration exceeds the maximum concentration for toxicity characteristic found in 40 CFR 261.24, Table 1) the combustion chamber will be cleaned using a high-efficiency particulate filter

equipped vacuum to remove the loose residual material. The combustion chamber will then be washed using clean water. A sample of the final rinse water will be obtained and analyzed as described in Section 4.3.4 of this Closure Plan. The combustion chamber will be considered to be clean if the concentration of the indicator metal in the rinse water sample is less than the maximum concentration for toxicity characteristic found in 40 CFR 261.24, Table 1.

Goodyear inspects the interior of the boiler during regularly scheduled plant shutdowns. As a result, no internal inspection of the boiler will be performed as part of this closure. Instead, a visual inspection of boiler and the concrete foundation of the boiler will be performed. In addition, the structural integrity testing, operating and daily inspection records for the boiler will be reviewed. If this review cannot verify the structural integrity of the boiler or the operating and daily inspection records indicate that a release of hazardous material to the concrete foundation of the boiler has occurred then samples will be obtained from the slab and the soil beneath the slab. These samples will be analyzed as described in Section 4.3.4 to help determine if a release has occurred. The concrete and soil analytical results will be evaluated consistent with the Texas Risk Reduction Standard 2 (RRS2) criteria for non-residential sites (30 TAC 335 Subchapter S). If the analytical results exceed the RRS2 criteria, an evaluation of whether removal, containerization, characterization and disposal are practical will be performed. If removal of contaminated material to achieve RRS2 standards is not practical, a plan to achieve closure under RRS3 will be prepared.

4.3.2 Vessel V-411

Vessel V-411 will also remain in service after closure. The vessel will continue to be used to store the organic heavies but will no longer be considered a hazardous waste storage tank due to reclassification of the organic heavies as a co-product. Since the contents of the vessel will remain unchanged, no emptying, cleaning or decontamination of the vessel is planned as part of the closure.

Vessel V-411 is equipped with a leak detection system and an HDPE-lined concrete secondary containment system. The proper operation of the leak detection system and the structural integrity of the vessel and secondary containment liner will be verified by visual observation of the vessel and liner, and a review of the structural integrity testing records of the vessel.

If concerns are noted regarding operation of the leak detection system and/or the structural integrity of the vessel that could have potentially permitted a release of hazardous waste, then samples will be obtained from the surrounding soils. Additionally, if concerns are noted regarding the integrity of the secondary containment system, then sampling of the soil beneath the secondary containment will

be performed. The number of samples required will be determined based upon field observations. These samples will be analyzed as described in Section 4.3.4 to help determine if a release has occurred. Soil sampling results will be evaluated consistent with the RRS2 criteria for non-residential sites (30 TAC 335 Subchapter S). If the analytical results exceed the RRS2 criteria, an evaluation of whether removal, containerization, characterization and disposal are practical will be performed. If removal of contaminated material to achieve RRS2 standards is not practical, a plan to achieve closure under RRS3 will be prepared.

4.3.3 Piping Between Boiler M-526 and Vessel V-411

Approximately 400 feet of piping connects vessel V-411 to boiler M-526 for the purpose of transferring waste for incineration. During closure, residual waste in the piping will be removed and transferred back into vessel V-411, and the piping will be disconnected from V-411 and the boiler. The piping will be decontaminated by flushing with steam followed by a water rinse.

Once the decontamination is complete, sections of the pipe at the V-411 end and the boiler end will be visually inspected for cleanliness. A sample of the final rinse water will be obtained and analyzed as described in section 4.3.4 to verify that no residual organic heavies remain in the piping. The piping will be considered clean if the concentration of the compound(s) of concern in the rinse water sample is less than the maximum concentration for toxicity characteristic found in 40 CFR 261.24, Table 1. The piping will then be sealed on each end by installing blind flanges or by other appropriate methods. The piping will be left in place.

4.3.4 Analytical and Sampling Procedures

Materials stored in vessel V-411 and burned in boiler M-526 are described as methanol and organic heavies. Rinsate samples obtained to verify the cleanliness of the piping and soil and/or concrete samples obtained to help determine if a release has occurred will be analyzed for 40 CFR 261 Appendix VIII (Appendix VIII) constituents that are reasonably expected to be found. Based on a comparison of the composition of the former hazardous waste stream to the Appendix VIII constituents; samples of the soil, concrete, and rinse water will be analyzed for benzene using EPA Method SW846-8260. Samples of the soil and/or concrete will be further analyzed for benzene using the synthetic precipitation leaching procedure (SPLP) for use in determining if RRS2 criteria has been achieved.

Because the chemical of concern, benzene, could not survive combustion in the boiler combustion chamber, samples of the residual material will not be analyzed for benzene. However, because it is

impossible from an analytical standpoint to determine if the former waste contained absolutely no metals, it can be reasonably assumed that the former waste may have contained trace levels of metals that were not detected by appropriate analytical methods. These metals from the former waste (if any) could possibly build up on the walls of the boiler combustion chamber over a long period of time. The sample of residual material from the boiler combustion chamber will be analyzed for an indicator metal. Based on the construction materials of the boiler and process knowledge the residual material sample from the boiler combustion chamber will be analyzed for silver using EPA Method SW846-6010A and the toxicity characteristic leaching procedure (TCLP).

If necessary, concrete samples will be obtained using chipping or diamond bit coring techniques. If necessary, soil samples will be obtained from the upper one-foot of soil in the sample area using a clean split-spoon sampler or hand auger and generally accepted environmental sampling procedures. The residual material sample from the boiler combustion chamber will be obtained by scraping the material into a laboratory supplied glass container. The samples obtained will be placed in laboratory supplied containers, labeled, placed in a cooler with containerized ice, and transported to the analytical laboratory with chain-of custody documentation.

Rinsate samples will be obtained by transferring a portion of the final rinse solution into laboratory supplied containers. The samples will be labeled, placed in a cooler with containerized ice, and transported to the analytical laboratory with chain-of custody documentation.

4.3.5 Waste Disposal

If the combustion chamber residual material is found to be hazardous and is removed as described in Section 4.3.1 of this Closure Plan, the removed material will be containerized and disposed of in accordance with acceptable hazardous waste management practices.

An estimated 100 gallons of condensed steam and rinse water from the cleaning of the piping and the boiler combustion chamber (if needed) may be generated. These fluids will be contained and disposed by discharging the fluids into the Plant's wastewater treatment system. The Plant's wastewater treatment system is registered with the TNRCC and routinely handles liquids with higher concentrations of the constituents found in the former waste by treating the wastewater in phase separators and a steam-stripping column. Following on-site treatment, the wastewater is pumped to Gulf Coast Waste Disposal Authority (GWDA) for further treatment before discharge under GCWDA's NPDES permit. GCWDA handles wastewater from approximately 50 industrial

1: D- 30316-Co

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Region 12 Files

Date: September 12, 2001
(Revised June 21, 2002)

Thru: Industrial & Hazardous Waste Team Leaders
Houston Office, Region 12

From: John F. Wilson, Environmental Investigator
Industrial and Hazardous Waste Section
Houston Office, Region 12

Subject: The Goodyear Tire and Rubber Company, Bayport Plant
TNRCC ID # 30316; EPA ID # TXD074185141
Summary of Regional File Information

I. INTRODUCTION

During September 2001, a review of the Texas Natural Resource Conservation Commission (TNRCC) Region 12 Office file information was conducted for the above-named facility. The purpose of this activity was to thoroughly review the files and summarize the status of this facility based upon the information available in the regional file system. This Interoffice Memorandum (IOM) is based upon this information and does not necessarily represent all of the information that the TNRCC may have available for a specific facility since the regional file system is considered a working/informational file system only. The official TNRCC files are located at the TNRCC Central Office in Austin which may be contacted at (512) 239-2920.

II. BACKGROUND INFORMATION

The Goodyear Tire and Rubber Company, Bayport Plant (Goodyear) is located at 13441 Bay Area Boulevard on a 75 acre tract at the southwest corner of the intersection of Bay Area Boulevard and Fairmont Parkway in Pasadena, Harris County, Texas. Land use within the area is residential, commercial and industrial. A residential subdivision is located approximately one (1) mile to the northwest of the facility.

Goodyear produces hydroquinine, acetone (a co-product stream from the hydroquinine process), and other specialty chemicals (Trade names Wingstay SN-1 and Wingstay 29). Hydroquinine is an organic chemical used to make an antioxidant utilized in the manufacture of synthetic rubber. The hydroquinine manufacturing process consists of three (3) units: alkylation, oxidation, and recovery. Goodyear uses a wide variety of chemicals in their manufacturing process, including oxidizers, acetone, benzene, styrene, propylene, and cumene.

The current Notice of Registration (NOR), last amended 3/14/2002, indicates that Goodyear is an active industrial large quantity generator (LQG). There are fifteen (15) hazardous, sixteen (16) Class 1, and six (6) Class 2 waste streams generated at the facility. Active waste management units include seven (7) wastewater treatment plants (WWTP), two (2) tanks, two (2) miscellaneous storage containers, one container storage area (CSA), and one (1) boiler. The NOR also indicates that there is one (1) inactive and one (1) closed surface impoundment at the facility.

III. PERMIT AND OPERATIONAL INFORMATION

Goodyear operates an interim status 72.5 million Btu/hr natural gas-fired hazardous waste boiler (NOR Unit 003). The vent gases from the 100, 200, and 300 process units and tank farm are also burned in the boiler and considered to be an insignificant fuel with a low Btu value. The boiler serves as a control device for the plant's closed vent system and operates under TNRCC Account Number HG-0288-M. There are no air pollution control devices for the boiler. The flue gas is vented through a circular stack. The boiler is equipped with an extractive carbon monoxide (CO) and oxygen (O2) continuous emission monitoring system (CEMS). The facility operates the unit under adjusted Tier I limits for the 10 BIF metals and chlorine.

The most recent compliance test recertification for the BIF was conducted on 5/22/96, with the current Certificate of Compliance (COC) dated 8/19/96. In 3/98, Goodyear performed a compliance test to establish a minimum burn temperature as required under 40 CFR 266.103(g)(1).

On 10/28/98, the TNRCC Industrial and Hazardous Waste (IHW) Permits Section notified Goodyear that the hazardous waste boiler would require a hazardous waste permit and that Goodyear would need to submit a Trial Burn Plan within 90 days. On 11/3/98, Goodyear requested a delay in submitting the Trial Burn Plan, citing ongoing discussions with TNRCC staff to reclassify the hazardous waste burned in the boiler to a co-product status. On 11/16/98, Goodyear was granted an extension by the TNRCC IHW Permits Section and given until 3/17/99 to submit a Trial Burn Plan. On 1/28/99, Goodyear requested a second extension for submitting a Trial Burn Plan, with the extension being granted on 2/8/99. Goodyear was given until 4/30/99 to submit the Trial Burn Plan.

On 6/11/99, Goodyear requested a retraction of the need for a Trial Burn due to the TNRCC considering a reclassification of the waste to "co-product," thereby eliminating the need to burn waste in the boiler and the requirement for a permit. On 7/16/99, the TNRCC approved the reclassification of the waste and waived the need for a Trial Burn Plan. Goodyear was then required to submit a closure plan for the boiler by 8/30/99. On 12/17/99, the TNRCC approved the final closure plan and set a deadline of 6/14/00 as the date for completion of the closure. On 4/12/00, Goodyear requested an extension of time for the closure to shutdown the boiler and allow time for sampling while accommodating the production schedule. On 4/27/00, the extension was approved and the final closure date was changed to 9/14/00. On 9/6/00, Goodyear submitted the Closure

Certification report for the boiler and associated storage vessel (Tank V-411). A Notice of Deficiency (NOD) was sent to Goodyear from the TNRCC on 11/27/00. On 1/23/01, Goodyear requested an extension for submittal of response to the NOD, which was granted by the TNRCC until 3/12/01. Response to the NOD was received in March 2001 and was approved on 4/10/2001. Based on information received, the closure of Boiler M-526 and Vessel V-411 was completed in accordance with 40 CFR 264.110 through 264.115 and the risk reduction standards set forth under 30 TAC 335 Subchapter S.

IV. GROUNDWATER INFORMATION

The Goodyear Bayport plant implemented a groundwater monitoring program to detect releases from the aeration pond, a former wastewater treatment unit out of service since 1992. The impoundment did not meet the minimum technology requirements for liners and was not granted a variance from retrofitting by the EPA. In 6/91, Goodyear installed four (4) groundwater monitoring wells and one (1) piezometer in the vicinity of the in the vicinity of the aeration pond and initiated quarterly background sampling. Quarterly groundwater monitoring reports have been submitted to the TNRCC since the institution of the monitoring. On 7/26/01, Goodyear received approval to terminate the groundwater monitoring program and plug the wells from the TNRCC as the results of the previous eight calendar quarters of monitoring indicated that the closure activities successfully removed contaminants that could potentially into the groundwater.

V. COMPLIANCE HISTORY

The following is a brief summary of the investigations conducted at this facility that are present in the Region 12 files. The investigation reports and other information regarding this facility can be viewed at the regional office file room or may be obtained from the TNRCC Central Office. It should be noted that the regional system files are maintained on a five (5) year basis and may not contain all of the information that the TNRCC may have available for a specific facility.

On 11/28 through 11/30/94, Aron Athavaley of the Region 12 Office conducted a Compliance Evaluation Investigation (CEI) with five (5) violations documented concerning notification requirements, waste analysis plan, general inspection requirements, unauthorized discharge, and RCRA tank inspections. One (1) area of concern was also documented regarding the integrity of a secondary containment system.

On 5/16/95, Roxana Herrera of the Region 12 Office conducted a Comprehensive Groundwater Monitoring Evaluation (CME) Inspection with one (1) violation documented concerning the groundwater monitoring system, and two (2) areas of concern regarding entries in the well logs and lack of response to an approval letter for an alternate monitoring plan.

On 11/21 and 11/29/95 Aron Athavaley of the Region 12 Office conducted a CEI with five (5)

violations documented concerning hazardous waste determinations, notification requirements, recordkeeping, unauthorized discharge, and accumulation time. Two (2) areas of concern were also documented regarding feed rate tier limits for the BIF and CO monitoring.

On 1/16/97, Aron Athavaley of the Region 12 Office conducted a Closure and Sampling Inspection on the Interim Status Aeration Surface Impoundment with no violations documented.

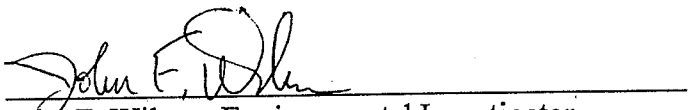
On 10/22/97, Aron Athavaley of the Region 12 Office conducted a Closure and Sampling Inspection as a follow-up to the closure construction activities on the Interim Status Aeration Surface Impoundment with no violations documented.

On 11/19 and 12/2/97, Billie Zaporteza of the Region 12 Office conducted a Boiler Industrial Furnace (BIF) investigation with four (4) violations documented concerning the assessment of the existing tank system's integrity, waste analysis, automatic waste feed cutoff (AWFCO), the content of the contingency plan, and general inspection requirements.

On 2/26/99, Scott Mayo of the Region 12 Office conducted a CEI with one (1) area of concern documented regarding the changing of the classification of a hazardous waste stream to a co-product.

On 6/13 and 7/17/00, Jill Burris of the Region 12 Office conducted a BIF investigation with four (4) violations documented concerning interim status standards for boilers, personnel training, hazardous waste determinations, and notification requirements. One other issue was also documented regarding the changing of the classification of a hazardous waste stream to a co-product. The violations were resolved in 12/00.

This memo will be periodically updated and is submitted as file data.

Signed: 

John F. Wilson, Environmental Investigator
Industrial & Hazardous Waste Section
Region 12- Houston

JFW/NMB/RSY/jw

IHW-30316-IN

Texas Commission on Environmental Quality

Investigation Report

THE GOODYEAR TIRE & RUBBER COMPANY

GOODYEAR TIRE & RUBBER CO

RN102608932

Investigation # 112690

Incident #

Investigator: ALMA WALKER

Site Classification

LARGE QUANTITY GENERATOR
BOILER
SURFACE IMPOUNDMENT
WASTEWATER TREATMENT PLANT
CONTAINER STORAGE AREA
TANK (SURFACE)
MISCELLANEOUS STORAGE CONTAINERS

Conducted: 05/21/2003 -- 05/21/2003

SIC Code: 2869
NAIC Code: 325199

Program(s):
INDUSTRIAL AND HAZARDOUS WASTE NONPERMITTED
INDUSTRIAL AND HAZARDOUS WASTE STORAGE
INDUSTRIAL AND HAZARDOUS WASTE GENERATION
INDUSTRIAL AND HAZARDOUS WASTE PROCESSING

Investigation Type : Compliance Investigation

Location : 13441 Bay Area Blvd.

Additional ID(s) :
30316
TXD074185141
50024
HG0288M

Address: 13441 BAY AREA BLVD; PASADENA, TX 77507

Activity Type : IHW CEI TSD - CEI of treatment/storage/disposal facility

Principal(s) :

Role	Name
RESPONDENT	THE GOODYEAR TIRE & RUBBER COMPANY

Contact(s) :

Role	Title	Name	Phone	
Regulated Entity Contact	ENVIRONMENTAL SPECIALIST	MS BONNIE BAINTER	Work	(281) 474-0069
Participated in Investigation	SITE MANAGER	MR WARREN HALL	Work	(281) 474-0014
Notified	ENVIRONMENTAL SPECIALIST	MS BONNIE BAINTER	Work	(281) 474-0069
Participated in Investigation	MANAGER OF PLANT SERVICES	MR PAUL MILLER	Work	(281) 474-0017

Other Staff Member(s) :

Role	Name
SUPERVISOR	RAMA YADAV
QA REVIEWER	ALBERT ROCO JR

Associated Check List

Checklist Name	Unit Name
IHW INVESTIGATION TYPES	30316 TYPES

IHW CEI GENERAL FACILITY	30316 GEN
IHW CONTAINER STORAGE AREA	30316 CSA
IHW LAND DISPOSAL RESTRICTIONS FOR GENERA	30316 LDR
IHW PRE-INVESTIGATION	30316 PRE
IHW SOURCE REDUCTION & WASTE MINIMIZATI	30316 SRWM

Investigation Comments :

INTRODUCTION

On May 21, 2003, Ms. Alma L. Walker of the Texas Commission on Environmental Quality (TCEQ) Region 12 - Houston Office conducted a Compliance Evaluation Investigation (CEI) of The Goodyear Tire and Rubber Company (Goodyear) Bayport Chemical Plant located at 13441 Bay Area Boulevard, Pasadena (Harris County), Texas. Ms. Bonnie Bainter, Environmental Specialist, was notified of the impending investigation by telephone and fax on May 6, 2003. The fax included a list of documents that would be reviewed as part of the CEI. The investigation involved an opening conference, records review, a site tour, and exit interview. Ms. Bainter, Mr. Paul E. Miller, Manager of Plant Services, and Mr. Warren Hall, Site Manager, represented the facility during the investigation. During the opening conference, the nature and scope of the investigation were explained to facility representatives. The following records were reviewed during the investigation: Hazardous Waste Permit correspondence, Notice of Registration, waste classification documentation, waste shipment manifests, land disposal restriction (LDR) documentation, annual waste summaries, employee training records, inspection records, closure documentation, facility maps, emergency response procedures, and contingency plan. During the exit interview, the findings of the investigation were discussed. The discussion included areas of noncompliance concerning notification, inspections, recordkeeping and reporting, shipping and reporting, and source reduction and waste minimization. The following pamphlet was given to facility representatives: "The TCEQ Has Inspected Your Business, What Does This Mean to You?" (RG-344).

GENERAL FACILITY AND WASTE PROCESS INFORMATION

Goodyear is situated on a 75-acre tract of land at the southwest corner of the intersection of Bay Area Boulevard and Fairmont Parkway in Pasadena, Texas. The plant was built in 1971 by Signal Chemical Company. Big Three Industries bought the property in 1973 and leased it to Goodyear a few months later. Goodyear purchased the plant in April 1978. Land use within a one mile radius is industrial, commercial, and residential. A site map is shown in Attachment 1. The plant has approximately 36 Goodyear employees and 13 contract employees, and operates seven days per week. The plant maintains 24 hour security with a manned gate and fenced perimeter.

Goodyear produces hydroquinone, acetone (a by-product stream from the hydroquinone process), and other specialty chemicals. Hydroquinone is an organic chemical used to make an antioxidant which, when added to rubber products (principally tires), helps prevent cracking and deterioration. The hydroquinone manufacturing process consists of three major units: alkylation, oxidation, and recovery. Goodyear uses a wide variety of chemicals in their manufacturing process, including oxidizers, acetone, benzene, styrene, propylene, and cumene.

Goodyear's Solid Waste Registration (SWR) # is 30316. The current Notice of Registration (NOR) last amended on March 13, 2002 (Attachment 2) indicates that Goodyear is registered as an industrial, large quantity generator (LQG) of hazardous waste operating under the North American Industry Classification System (NAICS) Code 325192 for manufactures of cyclic crudes and intermediates. The plant maintains a hazardous waste (HW) permit (HW-50024) originally submitted on September 23, 1991. Goodyear submitted Part A and Part B permit applications in 1990 and 1991, respectively, to close a surface impoundment (NOR # 002). Details regarding this impoundment are discussed in the Groundwater Monitoring Section of this report.

Goodyear previously operated an interim status 72.5 million Btu per hour natural gas-fired hazardous waste boiler and industrial furnace (BIF) unit (NOR # 003) under adjusted Tier I limits for the 10 BIF metals and chlorine. On October 28, 1998, the TCEQ Industrial and Hazardous Waste (IHW) Permits Section notified Goodyear that the hazardous waste boiler would require a hazardous waste permit and that Goodyear would need to submit a Trial Burn Plan (inclusive of a Risk Burn Plan). On June 11, 1999, Goodyear requested a retraction of the need for a Trial Burn due to the TCEQ considering a reclassification of the waste to "co-product," thereby eliminating the need to burn waste in the boiler and the requirement for a permit. On July 16, 1999, the TCEQ approved the reclassification of the waste and waived the need for a Trial Burn Plan. Goodyear was then required

to submit a closure plan for the boiler. Goodyear's Closure Certification report for Boiler M-526 (NOR # 003) and associated storage tank V-411 (NOR # 012) was approved on April 10, 2001 (Attachment 3). The NOR should be revised to address the current status of these units. This was discussed during the exit interview and is addressed below in the section entitled Summary of Outstanding Alleged Violations (Violations). On August 5, 2002, Goodyear submitted a request to withdraw the permit application. On August 20, 2002, the TCEQ issued a letter approving the withdrawal of the permit (Attachment 4).

The plant's wastewater is discharged through an underground pipeline to the Gulf Coast Waste Disposal Authority, a publicly owned treatment works (POTW). The plant's air emissions are regulated under Air Account # HG-0288M.

Waste Streams (WS)

The NOR indicates thirty-seven (37) active waste streams are generated at the plant. Of these, fifteen (15) are classified as Hazardous, sixteen (16) as Class 1, and six (6) as Class 2. Upon review of the NOR, several revisions are required. These revisions were discussed during the exit interview and are addressed in the Violations section of this report. The plant submitted an incorrect Annual Waste Summary for the 2002 reporting year (Attachment 5), and several manifests (Attachment 6) contained an incorrect generator's Environmental Protection Agency (EPA) identification number and/or incorrect Texas Waste Codes. These items were discussed with the plant representatives during the exit interview and are addressed further in the section entitled Summary of Alleged Noncompliances Noted And Resolved (Noncompliances).

Disposal/recycling facilities utilized by Goodyear include: Safety-Kleen Systems, Inc. in Missouri City, La Porte, and Denton, Texas and Browning Ferris Inc. in Anahuac and Houston, Texas.

Waste Management Units (WMUs)

Active waste management units include seven (7) wastewater treatment plants (WWTP), two (2) tanks, two (2) miscellaneous storage containers (MSCs), one (1) container storage area (CSA), and one (1) boiler. The NOR also indicates that there is one (1) inactive and one (1) closed surface impoundment at the plant. The plant also maintains one (1) satellite accumulation area (SAA) onsite. This area is identified on the plant map (Attachment 1). A CSA table is shown in Attachment 7. A tanks table is shown in Attachment 8.

The SAA, CSA, and MSCs were investigated and all containers were closed and appropriately labeled. No noncompliances were noted during the site investigation. The CSA inspection log was reviewed for the period between January 2, 2002 through May 13, 2003. There were several weeks during this period where there were no inspection records for the containers. This was discussed with plant representatives during the exit interview and is addressed further in the Noncompliances section of this report.

During the investigation, there was no information available regarding the current status of the inactive surface impoundment (NOR # 001). This was discussed during the exit interview and is addressed further in the Area of Concern section of this report.

BACKGROUND

The regulatory status concerning general information and past noncompliances was verified pursuant to the investigation. It is noted that there are no unresolved noncompliances from the previous investigations for this plant.

Fires, Explosions, Releases

There were no fires, explosions, or other releases noted at Goodyear that have threatened, or could have threatened, human health outside of the plant site, or spills that reached surface waters in the past three years.

Groundwater Monitoring

Goodyear implemented a groundwater monitoring program to detect releases from the aeration pond (NOR # 002), a former wastewater treatment unit out-of-service since 1992. The impoundment did not meet the minimum technology requirements for liners and was not granted a variance from retrofitting by the EPA. In June 1991, Goodyear installed four groundwater monitoring wells and one piezometer in the vicinity of the aeration pond and initiated quarterly background sampling. Quarterly groundwater monitoring reports were submitted to the TCEQ. On January 7, 2000, Goodyear was released from post-closure care responsibilities for the closed impoundment (Attachment 9). On July 26, 2001, Goodyear received approval from the TCEQ to terminate the groundwater monitoring program and plug the wells as a result of the previous eight calendar quarters of monitoring indicating that the closure activities successfully removed the contaminants that could potentially enter the groundwater (Attachment 10).

Financial Assurance

Due to closing the interim status boiler and feed tank and acceptance of deed certification and release from post-closure care responsibilities by the TCEQ for the interim status surface impoundment (NOR # 002), the plant is no longer required to maintain financial assurance.

SUMMARY OF OUTSTANDING ALLEGED VIOLATIONS

1. 30 Texas Administrative Code (TAC) 335.6(c) - Notification Requirements (Category C3)

Upon review of the Notice of Registration (NOR), the following revisions/updates are required:

- Update the operator telephone number.

- Update the NOR to reflect the withdrawal of permit # 50024.

- Inactivate the following waste streams (WS) which are no longer used: WS #s 0019219H and 0020219H.

- Add Environmental Protection Agency (EPA) Hazardous Waste Numbers "D001", "D035", "F003", and "F005" to WS,# 0032209H.

- Update the unit status for the boiler (NOR # 003) and the boiler feed tank (NOR # 012) from "Active" to "Closed."

- Remove inactive waste streams from currently managed in units NOR #s 004 and 005.

This violation was partially resolved based on documentation received from the plant on June 4, 2003 (Attachment 11) indicating they added EPA Hazardous Waste Numbers "D039", "D009", "D001" to WS #s 0018203H, 0023301H, and 0035101H, respectively. The remaining revisions are still required for complete resolution of this violation.

2. 30 TAC 335.474 - Source Reduction and Waste Minimization Plans (Category B3)

As a large quantity generator (LQG) of hazardous waste, the plant should prepare a five-year source reduction and waste minimization plan and renew it once every five years. This plan was not available for review during the investigation. The plant representative was asked to develop a plan and submit an Executive Summary of the plan and a copy of the Certification of Completeness and Correctness to the Industrial Pollution Prevention Office in Austin, Texas and provide documentation of submittal to the Houston Region Office. As a LQG, the plant is also required to submit annual progress reports to the TCEQ Austin Office.

3. 30 TAC 335.69(a)(4) incorporating 335.112(a)(3) / 40 Code of Federal Regulations (CFR)

262.34(a)(4) incorporating 265.53(b) - Copies of Contingency Plan (Category B3)

During the investigation, there was no documentation that the site contingency plan had been submitted to all state and local agencies providing emergency response service. The plant representative was requested to provide all involved parties a current copy of the plan and send verification of submittal to the Houston Region Office.

SUMMARY OF ALLEGED NONCOMPLIANCES NOTED AND RESOLVED

The following alleged noncompliances were noted during the investigation and subsequently resolved based on corrective actions performed by the plant:

1. 30 TAC 335.9(a)(2) - Recordkeeping and Reporting: Waste Activities (Category C3)

The plant shall submit each year a complete and correct Annual Waste Summary detailing the management of each hazardous and Class 1 waste generated onsite during the reporting calendar year and the management of any hazardous or Class 1 waste generated in a year previous to the reporting year, but managed in the reporting calendar year. The plant submitted an incorrect annual waste summary for the 2002 reporting year.

This violation was resolved based on documentation received from the plant on June 4, 2003 (Attachment 11) indicating they submitted a change request for the annual waste summary to the TCEQ Austin Office.

2. 30 TAC 335.10(b)(1) and (22) / 40 CFR 262.20(a) - Manifests (Category C3)

Incorrect Texas Waste Codes were placed on shipments of waste (manifest #s S00700554, S00700555, and S00845843) which were sent to Safety-Kleen Systems, Inc. in La Porte, Texas and Denton, Texas. An incorrect generator's EPA identification number was placed on shipments of waste (manifest #s 01289016, 01289024, and 001289026) which were sent to BFI Gulf West Landfill in Anahuac, Texas. The plant representative was asked to correct the manifests and ensure appropriate waste codes and identification numbers are placed on future shipments.

This violation was resolved based on documentation received from the plant on June 4, 2003 (Attachment 11) indicating they corrected the manifests.

3. 30 TAC 335.69(a)(1)(A) / 40 CFR 262.34(a)(1)(i) incorporating 265.174 - Accumulation Time (Category C1)

There were no inspection records for the containers during the weeks of March 11, 2002, March 18, 2002, October 14, 2002, November 4, 2002, February 10, 2003, and February 17, 2003 in the plant's container storage area inspection log. Plant representatives were requested to ensure that weekly inspections are conducted while containers are being stored onsite.

This violation was resolved while the investigator was onsite based on the plant representatives indicating they will revise their procedures to ensure that containers are inspected weekly and train additional personnel to conduct inspections.

AREA OF CONCERN

During the investigation, there was no information available regarding the current status of a solid waste management unit (surface impoundment - NOR # 001) listed as "inactive" on the NOR. The plant representative was asked to submit documentation regarding the closure status of this unit.

The above citations contain the complete rule references and descriptions of violations. The citations, which are automatically generated by the database system and found in the next section

citations, which are automatically generated by the database system and found in the next section titled "Alleged Violations", are not complete and should be disregarded at this time.

NOV Date	Method
05/21/2003	VERBAL
	WRITTEN
06/20/2003	WRITTEN

ALLEGED NONCOMPLIANCES NOTED AND RESOLVED

Track No: 62160 **Resolution Date: 6/18/03**

30 TAC Chapter 335.10(b)(22)

Alleged Violation:
Investigation: 112690 Comment Date: 06/18/2003

Incorrect Texas Waste Codes were placed on shipments of waste (manifest #s S00700554, S00700555, and S00845843) which were sent to Safety-Kleen Systems, Inc. in La Porte, Texas and Denton, Texas. An incorrect generator's EPA identification number was placed on shipments of waste (manifest #s 01289016, 01289024, and 001289026) which were sent to BFI Gulf West Landfill in Anahuac, Texas.

Recommended Corrective Action: The plant representative was asked to correct the manifests by 06/04/2003 and ensure appropriate waste codes and identification numbers are placed on future shipments.

Resolution: This violation was resolved based on documentation received from the plant on June 4, 2003 indicating they corrected the manifests.

Track No: 62166 **Resolution Date: 6/18/03**

30 TAC Chapter 335.9(a)(2)(B)

Alleged Violation:
Investigation: 112690 Comment Date: 06/18/2003

The plant submitted an incorrect Annual Waste Summary (AWS) for the 2002 reporting year.

Recommended Corrective Action: The plant was asked to submit a change request for the 2002 AWS by 06/04/2003.

Resolution: This violation was resolved based on documentation received from the plant on 06/04/2003 indicating they submitted a change request for the AWS to the TCEQ Austin Office.

Track No: 62222 **Resolution Date: 6/18/03**

30 TAC Chapter 335.69(a)(1)(A)

Alleged Violation:
Investigation: 112690 Comment Date: 06/18/2003

There were no inspection records for the containers during the weeks of March 11, 2002, March 18, 2002, October 14, 2002, November 4, 2002, February 10, 2003, and February 17, 2003 in the plant's container storage area inspection log.

Recommended Corrective Action: Plant representatives were requested to ensure that weekly inspections are conducted while containers are being stored onsite.

Resolution: This violation was resolved while the investigator was onsite based on the plant representatives indicating they will revise their procedures to ensure that containers are inspected weekly and train additional personnel to conduct inspections.

OUTSTANDING ALLEGED VIOLATIONS

Track No: 62135 **Compliance Due Date: 11/17/03**

30 TAC Chapter 335.474

Alleged Violation:
Investigation: 112690 Comment Date: 06/18/2003

The plant failed to prepare a five-year source reduction and waste minimization plan.

Recommended Corrective Action: The plant representative was asked to develop a plan and submit an Executive Summary of the plan and a copy of the Certification of Completeness and Correctness to the Industrial Pollution Prevention Office in Austin, Texas and provide documentation of submittal to the Houston Region Office. As a LQG, the plant is also required to submit annual progress reports to the TCEQ Austin Office.

Resolution:

Track No: 62152 **Compliance Due Date: 11/17/03**

30 TAC Chapter 335.6(c)

Alleged Violation:
Investigation: 112690 Comment Date: 06/18/2003

The plant failed to update its Notice of Registration (NOR). This violation was partially resolved based on documentation received from the plant on June 4, 2003 indicating they added EPA Hazardous Waste Numbers "D039", "D009", and "D001" to waste stream (WS) #s 0018203H, 0023301H, and 0035101H, respectively.

Recommended Corrective Action: The remaining revisions are still required for complete resolution of this violation:

- Update the operator telephone number.

- Update the NOR to reflect the withdrawal of permit # 50024.

- Inactivate the following waste streams (WS) which are no longer used: WS #s 0019219H and 0020219H.

- Add Environmental Protection Agency (EPA) Hazardous Waste Numbers "D001", "D035", "F003", and "F005" to WS # 0032209H.

- Update the unit status for the boiler (NOR # 003) and the boiler feed tank (NOR # 012) from "Active" to "Closed."

- Remove inactive waste streams from currently managed in units NOR #s 004 and 005.

Resolution:

Track No: 62194 **Compliance Due Date: 11/17/03**

30 TAC Chapter 335.69(a)(4)

Alleged Violation:
Investigation: 112690 Comment Date: 06/18/2003

The plant failed to provide documentation that the site contingency plan had been submitted to all state and local agencies providing emergency response service.

Recommended Corrective Action: The plant representative was requested to provide all involved parties a current copy of the contingency plan and send verification of submittal to the Houston Region Office.

Resolution:

Signed Alma L. Walber Date 06/20/03
Environmental Investigator

Signed Ramen Yadav Date 6/20/03
Supervisor

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
__✓__Letter to Facility (specify type) : NOV
Investigation Report
___Sample Analysis Results
__6__Manifests
__2__NOR

__1__Maps, Plans, Sketches
___Photographs
__11__Correspondence from the facility
__✓__Other (specify) :
See list of attachments for 3, 4, 5, 7, 8, 9, & 10

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 20, 2003

CERTIFIED MAIL # 7001 2510 0007 0184 9377
RETURN RECEIPT REQUESTED

Ms. Bonnie Bainter, Environmental Specialist/Plant Trainer
The Goodyear Tire & Rubber Company
P.O. Box 669
La Porte, TX 77572

Re: Notice of Violation for the Compliance Evaluation Investigation (CEI) at:
Bayport Chemical Plant, 13441 Bay Area Boulevard, Pasadena (Harris County), Texas
TCEQ ID No.: 30316; EPA ID No.: TXD074185141; Permit No.: 50024

Dear Ms. Bainter:

On May 21, 2003, Ms. Alma L. Walker of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for industrial solid waste. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted which were alleged noncompliances that have been resolved through verbal notification and subsequent corrective action. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office within 30 days of receipt of this letter a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules." Copies of applicable federal regulations may be obtained from either of the following offices:

U.S. Government Printing Office
Texas Crude Building
801 Travis Street
Houston, Texas 77002
713/228-1187 (phone)

U.S. Government Printing Office
Room 1C-50
Federal Building
1100 Commerce Street
Dallas, Texas 75242
214/767-0076 (phone)

The Texas Commission on Environmental Quality appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify the Houston Region Office within 10 days from the date of this letter. At that time, Ms. Marsha Hill, Waste Program Manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Walker in the Houston Region Office at (713) 767-3605.

Sincerely,

Rama S. Yadav, Ph.D., P.E.
Team Leader, Waste Section
Houston Region Office

RSY/ALW/lz

Enclosures: Summary of Investigation Findings
Obtaining TCEQ Rules

SUMMARY OF INVESTIGATION FINDINGS

The Goodyear Tire & Rubber Company Bayport Chemical Plant
13441 Bay Area Boulevard, Pasadena (Harris County), Texas
TCEQ ID No.: 30316, EPA ID No.: TXD074185141, Permit No.: 50024
Investigation Date: May 21, 2003

OUTSTANDING ALLEGED VIOLATIONS

1. <u>30 Texas Administrative Code (TAC) § 335.6(c) - Notification Requirements</u>

Upon review of the Notice of Registration (NOR), the following revisions/updates are required:

- Update the operator telephone number.
- Update the NOR to reflect the withdrawal of permit # 50024.
- Inactivate the following waste streams (WS) which are no longer used: WS #s 0019219H and 0020219H.
- Add Environmental Protection Agency (EPA) Hazardous Waste Numbers "D001", "D035", "F003", and "F005" to WS # 0032209H.
- Update the unit status for the boiler (NOR # 003) and the boiler feed tank (NOR # 012) from "Active" to "Closed."
- Remove inactive waste streams from currently managed in units NOR #s 004 and 005.

This violation was partially <u>resolved</u> based on documentation received from the plant on June 4, 2003 indicating they added EPA Hazardous Waste Numbers "D039", "D009", and "D001" to WS #s 0018203H, 0023301H, and 0035101H, respectively. The remaining revisions are still required for complete resolution of this violation.

2. <u>30 TAC § 335.474 - Source Reduction and Waste Minimization Plans</u>

- As a large quantity generator (LQG) of hazardous waste, the plant should prepare a five-year source reduction and waste minimization plan and renew it once every five years. This plan was not available for review during the investigation. The plant representative was asked to develop a plan and submit an Executive Summary of the plan and a copy of the Certification of Completeness and Correctness to the Industrial Pollution Prevention Office in Austin, Texas and provide documentation of submittal to the Houston Region Office. As a LQG, the plant is also required to submit annual progress reports to the TCEQ Austin Office.

3. **30 TAC § 335.69(a)(4) incorporating § 335.112(a)(3) / 40 Code of Federal Regulations (CFR) § 262.34(a)(4) incorporating § 265.53(b) - Copies of Contingency Plan**

o During the investigation, there was no documentation that the site contingency plan had been submitted to all state and local agencies providing emergency response service. The plant representative was requested to provide all involved parties a current copy of the plan and send verification of submittal to the Houston Region Office.

ALLEGED NONCOMPLIANCES NOTED AND RESOLVED

The following alleged noncompliances were noted during the investigation and subsequently resolved based on corrective actions performed by the plant:

1. **30 TAC § 335.9(a)(2) - Recordkeeping and Reporting: Waste Activities**

o The plant shall submit each year a complete and correct Annual Waste Summary detailing the management of each hazardous and Class 1 waste generated onsite during the reporting calendar year and the management of any hazardous or Class 1 waste generated in a year previous to the reporting year, but managed in the reporting calendar year. The plant submitted an incorrect annual waste summary for the 2002 reporting year.

This violation was resolved based on documentation received from the plant on June 4, 2003 indicating they submitted a change request for the annual waste summary to the TCEQ Austin Office.

2. **30 TAC § 335.10(b)(1) and (22) / 40 CFR § 262.20(a) - Manifests**

o Incorrect Texas Waste Codes were placed on shipments of waste (manifest #s S00700554, S00700555, and S00845843) which were sent to Safety-Kleen Systems, Inc. in La Porte, Texas and Denton, Texas. An incorrect generator's EPA identification number was placed on shipments of waste (manifest #s 01289016, 01289024, and 001289026) which were sent to BFI Gulf West Landfill in Anahuac, Texas. The plant representative was asked to correct the manifests and ensure appropriate waste codes and identification numbers are placed on future shipments.

This violation was resolved based on documentation received from the plant on June 4, 2003 indicating they corrected the manifests.

3. **30 TAC § 335.69(a)(1)(A) / 40 CFR § 262.34(a)(1)(i) incorporating § 265.174 - Accumulation Time**

o There were no inspection records for the containers during the weeks of March 11, 2002, March 18, 2002, October 14, 2002, November 4, 2002, February 10, 2003, and February 17,

2003 in the plant's container storage area inspection log. Plant representatives were requested to ensure that weekly inspections are conducted while containers are being stored onsite.

This violation was <u>resolved</u> while the investigator was onsite based on the plant representatives indicating they will revise their procedures to ensure that containers are inspected weekly and train additional personnel to conduct inspections.

AREA OF CONCERN

1. During the investigation, there was no information available regarding the current status of a solid waste management unit (surface impoundment - NOR # 001) listed as "inactive" on the NOR. The plant representative was asked to submit documentation regarding the closure status of this unit.

LIST OF ATTACHMENTS

ATTACHMENT 1 Facility Maps & Plans Copied

ATTACHMENT 2 Notice of Registration copied

ATTACHMENT 3 Closure Documentation Copied

ATTACHMENT 4 Withdrawal of HW Permit Application Copied

ATTACHMENT 5 2002 Annual Waste Summary

ATTACHMENT 6 Manifests

ATTACHMENT 7 Container Storage Area Table

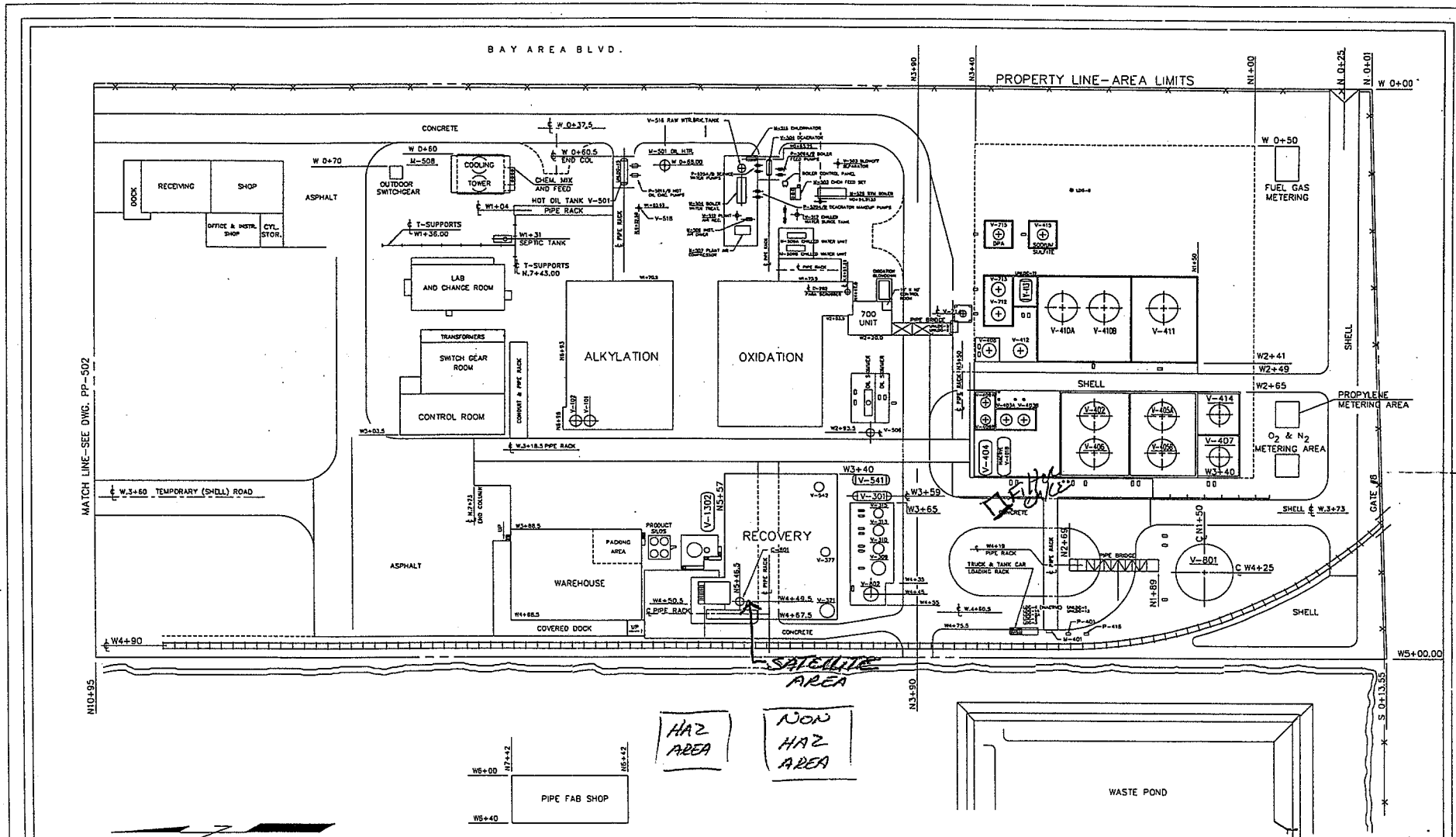
ATTACHMENT 8 Tanks Table copied

ATTACHMENT 9 Release From Post-closure Care copied

ATTACHMENT 10 Approval to Terminate Groundwater Monitoring Copied

ATTACHMENT 11 Correspondence From the Facility

SWR#30316


BAY AREA BLVD.
PROPERTY LINE-AREA LIMITS
MATCH LINE-SEE DWG. PP-502
CONCRETE
ASPHALT
DOCK
RECEIVING
SHOP
OFFICE & INSTR. SHOP
CYL. STOR.
OUTDOOR SWITCHGEAR
COOLING TOWER
CHEM. MIX AND FEED
HOT OIL TANK V-501
PIPE RACK
T-SUPPORTS
SEPTIC TANK
LAB AND CHANGE ROOM
TRANSFORMERS
SWITCH GEAR ROOM
CONTROL ROOM
ALKYLATION
OXIDATION
700 UNIT
FUEL GAS METERING
V-410A
V-410B
V-411
SHELL
PROPYLENE METERING AREA
O_2 & N_2 METERING AREA
V-414
V-407
V-402
V-405A
V-406
V-405B
V-404
W3+40
W3+59
W3+65
W3+73
W3+18.5 PIPE RACK
TEMPORARY (SHELL) ROAD
RECOVERY
V-541
V-301
V-1302
PRODUCT SLOS
PADDING AREA
WAREHOUSE
COVERED DOCK
TRUCK & TANK CAR LOADING RACK
V-801
GATE #8
W4+90
SATELLITE AREA
W5+00.00
N10+95
N3+90
S 0+13.55
HAZ AREA
NON HAZ AREA
PIPE FAB SHOP
WASTE POND
LEGEND:
MISC. HON MACT
HAP<1000, VP<0.1, TK.VA<5000, NOT OL
IN PROCESS TANKS, SURGE CONTROL VESSELS, AND INTERMEDIATE STORAGE.
OLD LOADING ARMS
GOODYEAR TIRE & RUBBER COMPANY
BAYPORT CHEMICAL PLANT
BAYPORT CHEMICAL PLANT
PLOT PLAN
PP-501-M
REV.NO. REVISION BY DATE
1 ENVIRONMENTAL DRAWING REA 4/97
2 REVISED FOR US EPA PRESENTATION JS 8/98

AH, 2

CHANGES TO NOTICE OF REGISTRATION

This form is to be used by a Facility Representative and/or a TCEQ Investigator
to request a change be made in the information in the TCEQ and EPA databases (TRACS and RCRA Info.)

CURRENT DATA:

Note: To change a Company Name, Mailing Address, Owner, Operator, E-mail, Telephone Number, Site name, Site location, or other basic information about the person, business and/or institution, the Core Data form, TCEQ- 10400, must be used. Changes to a permitted site or permitted unit requires Permit Modification form and approval by Permits Division.

TCEQ Solid Waste Registration No: 30316	TCEQ Permit No: 50024	EPA ID No: TXD074185141	Field Office F Number:	TCEQ Region #: 12
Company Name: The Goodyear Tire & Rubber Company				
Site Name: Bayport Chemical Plant				
Site Address: 13441 Bay Area Blvd				
Site City: Pasadena	Site State: TX	Site Zip: 77507 -		Site County: Harris

Registration number needed *(complete if applicable)*:

☐ Facility is required by 30 TAC 335 to register with (indicate all that apply):
[ ] TCEQ [ ] EPA

☐ Facility is not required by rule to register, but needs a Field Operations Identification Number [ ] EPA

PLEASE MAKE THE FOLLOWING CHANGES TO THE NOTICE OF REGISTRATION:

1. **Change Primary Contact Person to:** *(complete if applicable)*

Name:	Title:
Telephone No. /	Fax No. /
E-mail Address	

2. **Site Location:** *(complete if applicable)*

Registrations are Site Specific. Site location can only be changed (1) if Facility Type is Transporter only, (2) by U.S. Postal Service change, or (3) the Emergency 911 Program. Documentation Required)
This information is amended by using the Core Data Form TCEQ- 10400

3. **Change this site's Registration Status to:** *(complete if applicable)* Note: To change to a Closed Status (no longer in business and not generating regulated waste), the site must go through Corrective Action.

☐ Active (In business, generating regulated waste)
[ ] TCEQ Solid Waste Registration Number [ ] EPA ID Number

☐ Inactive (In business, not generating regulated waste)
[ ] TCEQ Solid Waste Registration Number [ ] EPA ID Number

☐ Abandoned (No longer in business, not generating regulated waste)
[ ] TCEQ Solid Waste Registration Number [ ] EPA ID Number

Reason for change:

4. **Change Generator Type to:** (complete if applicable and indicate all that apply)

☐ Industrial ☐ Non-Industrial and/or Municipal ☐ Railroad Commission Jurisdiction

Reason for change:

marked out 10/9/03

5. **Change Facility Type to:** (complete if applicable and indicate all that apply)

- [X] Generator
- [ ] Transfer Facility
- [ ] Receiver
- [ ] Transporter [ ] For Hire [ ] Transport Own Waste
- [ ] Did Not Notify TCEQ

[ ] Treatability Study (Hazardous Waste Only)

[ ] Landfill
( ) Class 1 ( ) Class 2 ( ) Class 3
( ) Hazardous ( ) Municipal/Non Industrial

[ ] Recycler
( ) Hazardous ( ) Class 1 ( ) Other

[ ] Treatment

[ ] Storage

[ ] Injection Well

[ ] Recovery
( ) Energy ( ) Metals ( ) Solvents ( ) Other

[ ] Other Disposal

6. **Change this site's Hazardous Waste Generation Type to:** (complete if applicable)

- [ ] Large Quantity Generator (LQG) – Generated 1.1 tons (1,000 kg or 2,200 lbs) or more of hazardous waste in any month this calendar year.
- [ ] Small Quantity Generator (SQG) – Generated more than 0.11 ton (100 kg or 220 lbs) but less than 1.1 tons (1,000 kg or 2,200 lbs) of hazardous waste per month this calendar year.
- [ ] Conditionally Exempt Small-Quantity Generator (CESQG) – Generated 0.11 ton (100 kg or 220 lbs) or less of hazardous waste per month and 1 kg (2.2lbs) or less of acutely hazardous waste per month, but generated more than 110 kg (220 lbs) of industrial Class I waste per month this calendar year.
- [ ] Conditionally Exempt Small-Quantity Generator (CESQG) – Generated 0.11 ton (100 kg or 220 lbs) or less of hazardous waste per month, 1 kg (2.2 lbs) or less of acutely hazardous waste per month, and generated less than 100 kg (220 lbs) of industrial Class I waste per month this calendar year. Stores less than 2,200 lbs hazardous waste and 1 kg (2.2 lbs) acutely hazardous waste. Does not receive or transport hazardous waste or industrial waste. (Note: Marking this category will inactivate your solid waste registration number and your EPA ID number.)

7. **Additional Comments**

On August 5, 2002, Goodyear submitted a request to withdraw the permit application. On August 20, 2002, the TCEQ Industrial and Hazardous Waste Permits Section issued a letter approving the withdrawal of the permit application submitted on September 23, 1991.

8. **Signatures / Names** (must be completed by TCEQ Investigator and/or Facility Representative for this form to be considered valid.)

Name of Facility Representative	Title of Facility Representative		Date
Bonnie Bainter	Environmental Specialist		05/21/2003
Alma L. Walker	Environmental Investigator	12	05/21/2003
Name of TCEQ Representative	Title of TCEQ Representative	Region #	Date

This form is to be mailed to:
Texas Commission on Environmental Quality
Registration, Review, and Reporting Division
Registration and Reporting Section MC 129
P.O. Box 13087
Austin, TX 78711-3087

*** TEXAS NATURAL RESOURCE CONSERVATION COMMISSION ***
Notice of Registration
Industrial and Hazardous Waste

30316 The Goodyear Tire & Rubber Company

Solid Waste Registration Number: 30316 EPA Id: TXD074185141

Company Name: The Goodyear Tire & Rubber Company
Site Name: Bayport Chemical
Site Location: 13441 Bay Area Blvd, Pasadena, TX
Contact: Bainter, Bonnie

Region: 12
County: 101 Harris
Title: Environmental Specialist Phone: 281-474-0069

Initial Registration Date: 04/07/1976
Last Amendment Date: 03/13/2002
Last Date NOR Computer update: 04/01/2003

Mailing Address: PO Box 669
La Porte, TX 77572-

Site Street Address: 13441 Bay Area Blvd
Pasadena, TX 77507

Registration Status: Active HW Permit #: 50024
Registration Type: Generator
Generator Type: Industrial

Reporting Method: STEERS

Hazardous Waste Generation Status: Large Quantity Generator

NAICS Code: 325192 Cyclic Crudes & Intermediates
Handler Status:

Operator Information
Name: The Goodyear Tire & Rubber Company
Phone: 281/474-0044
Address: 13441 Bay Area Blvd
Pasadena, TX, 77507

Owner Information
Name: The Goodyear Tire & Rubber Company
Phone: 330-796-2121
Address: 1144 E Market St
Akron, OH, 44316-0001

As of 03/13/2002 - the next unassigned sequence number for WASTES is 7778 and
the next unassigned sequence number for UNITS is 016.

30316 The Goodyear Tire & Rubber Company

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

00012191 1 Active 02/23/94 On/Off No No
Description from Generator: Wingstay Sn-1 off spec material. July 31, 1993.
Form Code: 219 Other organic liquids
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

00024091 1 Active 09/28/93 On/Off No
Description from Generator: Diphenylamine (N-Phenylaniline) off-spec material
Form Code: 409 Other non-halogenated organic solids
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

00034091 1 Active 09/28/93 On/Off No
Description from Generator: Scrap hydroquinone, off spec material
Form Code: 409 Other non-halogenated organic solids
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

00043011 1 Active 09/28/93 On/Off No
Description from Generator: Soil contaminated w/xylene & wastewater spill clean-up
Form Code: 301 Soil contaminated with organics
Current Management Units: Contain Store Area 004
Misc Store Container 005
* Origin Codes: 1 Onsite-process/service

00051011 1 Active 02/23/94 On/Off No
Description from Generator: Class 1 Non Hazardous wastewater generated as a result of steam stripping the organics from Hazardous waste water.
Form Code: 101 Aqueous waste with low solvents
Current Management Units: WWTP 006 010
* Origin Codes: 5 Onsite haz waste mgmt 1 Onsite-process/service

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0007319H H Active 10/27/94 On/Off No
Description from Generator: Spent flourescent light bulbs
Form Code: 319 Other waste inorganic solids
EPA Hazardous Waste Numbers: D009
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A99 Other
* Measurement Points: 1 Before mixing
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing 325192 Cyclic Crude and Intermediate Manufacturing

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00093191 1 Active 10/31/94 On/Off No
Description from Generator: Wingstay 29 Filtercake
Form Code: 319 Other waste inorganic solids
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

00103101 1 Active 10/27/94 Off No
Description from Generator: Spent filters (200 Unit)
Refers to waste code (6): 173340
Form Code: 310 Spent solid filters or adsorbents (inorganic)
Current Management Units: None
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up 3 From non-haz waste mgmt

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00113932 2 Active 10/27/94 Off No
Description from Generator: Spent silica alumina catalyst
Refers to waste code (6): 270970
Form Code: 393 Catalyst waste (inorganic solid)
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

00123082 2 Active 10/27/94 On/Off No
Description from Generator: Empty or crushed metal drums & containers
Refers to waste code (6): 272680
Form Code: 308 Empty or crushed metal drums or containers
Current Management Units: Misc Store Container 007
* Origin Codes: 1 Onsite-process/service

00143111 1 Active 10/27/94 On/Off No
Description from Generator: Asbestos solids and debris
Refers to waste code (6): 179390
Form Code: 311 Asbestos solids and debris
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

00166061 1 Active 10/27/94 On/Off No
Description from Generator: Resins, tars or tarry sludge, reactor tars
Refers to waste code (6): 281120
Form Code: 606 Resins, tars, or tarry sludge
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

0017101H H Active 10/31/94 On No No
Description from Generator: Process wastewater
Refers to waste code (6): 903540
Form Code: 101 Aqueous waste with low solvents
EPA Hazardous Waste Numbers: D018
Current Management Units: WWTP 006 008 009 010 013 014 015
* Origin Codes: 1 Onsite-process/service
* Source Codes: A37 Spent process liquids removal
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
****** Active Wastes ******						
0018203H	H	Active	10/27/94	Off		No

Description from Generator: Spent Safety Kleen Solvents
Refers to waste code (6): 910650
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D018
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A04 Flush rinsing
* Measurement Points: 1 Before mixing
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing 325192 Cyclic Crude and Intermediate Manufacturing

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0019219H	H	Active	10/27/94	On		No

Description from Generator: Waste methanol from R-706 OH
Refers to waste code (6): 911080
Form Code: 219 Other organic liquids
EPA Hazardous Waste Numbers: D001
Current Management Units: Boiler 003
Tank (Surface) 012
* Origin Codes: 1 Onsite-process/service
* Source Codes: A33 Product distillation
* Measurement Points: 1 Before mixing
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing 325192 Cyclic Crude and Intermediate Manufacturing

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0020219H	H	Active	10/27/94	On/Off		No

Description from Generator: Organic heavies
Refers to waste code (6): 914820
Form Code: 219 Other organic liquids
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: Boiler 003
Tank (Surface) 012
* Origin Codes: 1 Onsite-process/service
* Source Codes: A35 By-product processing
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00212061	1	Active	10/27/94	On/Off		No

Description from Generator: Used lube, compressor & crank case oil
Form Code: 206 Waste oil
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

00222191	1	Active	10/31/94	On/Off		No

Description from Generator: Scrap Wingstay 29
Form Code: 219 Other organic liquids
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

0023301H H Active 10/31/94 On/Off No No
Description from Generator: Soil contaminated with benzene >.5 ppm
Form Code: 301 Soil contaminated with organics
EPA Hazardous Waste Numbers: D018 U019
Current Management Units: Contain Store Area 004
* Origin Codes: 2 Spill clean-up
* Source Codes: A69 Other remediation
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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0024219H H Active 10/31/94 On/Off No No
Description from Generator: Scrap styrene monomer
Form Code: 219 Other organic liquids
EPA Hazardous Waste Numbers: D001
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A57 Discarding off-spec material
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00253191 1 Active 10/31/94 On/Off No
Description from Generator: Scrap dibuytl tin oxide (Fascat 4201)
Form Code: 319 Other waste inorganic solids
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

0026202H H Active 10/31/94 On/Off No No
Description from Generator: Spent 1,1,1 Trichloroethane
Form Code: 202 Halogenated (e.g., chlorinated) solvent
EPA Hazardous Waste Numbers: D018 U226
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A09 Clean out process equipment
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00292191 1 Active 10/31/94 On/Off No
Description from Generator: Contaminated Meta & Para DIPB
Form Code: 219 Other organic liquids
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

0031203H H Active 01/04/95 On/Off No
Description from Generator: Scrap N-N1 - Diethylhydroxylamine
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D001
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A58 Discarding out-of-date products or chemicals
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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0032209H H Active 01/04/95 On/Off No
Description from Generator: Residual paint waste from maintenance painting
Form Code: 209 Organic paint, ink, lacquer, or varnish
EPA Hazardous Waste Numbers: D007
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A21 Painting
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00332191 1 Active 01/04/95 On/Off No
Description from Generator: Alkylator heavies.
Form Code: 219 Other organic liquids
Current Management Units: Tank (Surface) 011
* Origin Codes: 1 Onsite-process/service

0034211H H Active 01/16/96 On/Off No
Description from Generator: Paint thinner (spent)
Form Code: 211 Paint thinner or petroleum distillates
EPA Hazardous Waste Numbers: D001
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A29 Other surface coating/preparation
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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0035101H H Active 02/21/95 Off No
Description from Generator: Spent C-801 filters
Form Code: 101 Aqueous waste with low solvents
EPA Hazardous Waste Numbers: D018
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A71 Filtering/screening
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

0036489H H Active 08/11/95 On/Off No
Description from Generator: Non ACM insulation/general debris
Form Code: 489 Petroleum contaminated solids
EPA Hazardous Waste Numbers: D018
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A53 Cleanup of spill residues A19 Other cleaning and degreasing
A21 Painting A99 Other
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00373072 2 Active 11/20/95 On/Off No
Description from Generator: Scrap metal
Form Code: 307 Metal scale, filings, or scrap
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service

00383891 1 Active 11/15/95 On/Off No
Description from Generator: Sandblasting waste
Form Code: 389 Nonhazardous sandblasting waste (inorganic solid)
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service

0041003H H Active 12/02/96 Off No
Description from Generator: Lab Pack
Form Code: 003 Mixed lab packs
EPA Hazardous Waste Numbers: D001 F005
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A58 Discarding out-of-date products or chemicals A94 Laboratory wastes
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing

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0043306H H Active 08/21/97 On/Off No
Description from Generator: Vessel cleanout residue; metal scale & rust.
Form Code: 306 "Dry" lime or metal hydroxide solids not "fixed"
EPA Hazardous Waste Numbers: D018
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
* Source Codes: A09 Clean out process equipment
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing

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00440031 1 Active 07/16/98 On/Off No No
Description from Generator: mixed lab pack nonhazardous
Form Code: 003 Mixed lab packs
Current Management Units: Contain Store Area 004
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): 00440031

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

00453012 2 Active 06/06/00 On/Off No No
Description from Generator: soil contaminated with hydrocarbons. class two non hazardous
Form Code: 301 Soil contaminated with organics
Current Management Units: Contain Store Area 004
* Origin Codes: 2 Spill clean-up

00469992 2 Active 06/19/00 On/Off No No
Description from Generator: plant trash, refuse {handled in 40 c y compactor-separate from other wastes} an amendment of waste #00159022
Form Code: 999 Plant Refuse
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service

00475132 2 Active 10/24/01 Off No
Description from Generator: Cooling tower sludge generated from clean process water is filtered through colling tower (dirt from water & air)
Form Code: 513 Inorganic Sed or lagoon dragout with inorgan only
Current Management Units: None
* Origin Codes: 1 Onsite-process/service 3 From non-haz waste mgmt

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* The first value is considered the primary value (e.g. primary origin code).
As of 03/13/2002, the next unassigned sequence number for WASTES is 7778.

** No Longer Generated Wastes **

0006203H H Inactive 06/19/00 NA No No
Description from Generator: Generated as a result of operating an ethylbengene distillation column. Waste inactivated due to source reduction.
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A33 Product distillation A59 Oth product-derived one-time intermittent process
* Measurement Points: 1 Before mixing
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing 325192 Cyclic Crude and Intermediate Manufacturing

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00082191 1 Inactive 06/19/00 NA No
Description from Generator: Off spec or contaminated (with H20) wingstay C product Waste inactivated due to source reduction.
Refers to waste code (6): 150430
Form Code: 219 Other organic liquids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

** No Longer Generated Wastes **

0013319H H Inactive 06/19/00 NA No
Description from Generator: Flotation pontoons filled with foam removed from aeration pond. (One time genera Waste inactivated due to one-time shipment.
Form Code: 319 Other waste inorganic solids
EPA Hazardous Waste Numbers: D018
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A89 Other pollution control or waste treatment
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00159022 2 Inactive 06/19/00 NA No
Description from Generator: Plant trash, refuse (handled in 40 C.Y. Compactor-separate from other wastes) Waste inactivated due to rule change.
Refers to waste code (6): 279760
Form Code: 902 Supplemental plant production refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

00273191 1 Inactive 06/19/00 NA No
Description from Generator: Wingstay C Filtercake Waste inactivated due to source reduction.
Form Code: 319 Other waste inorganic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

0028319H H Inactive 06/06/00 NA No No
Description from Generator: Scrap toluene sulfonic acid
Form Code: 319 Other waste inorganic solids
EPA Hazardous Waste Numbers: D002
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A57 Discarding off-spec material
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

---

0030409H H Inactive 06/19/00 NA No
Description from Generator: Xylene contaminated tars Waste inactivated due to source reduction.
Form Code: 409 Other non-halogenated organic solids
EPA Hazardous Waste Numbers: F003
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A09 Clean out process equipment
* Measurement Points: 1 Before mixing
* NAICS Code: 325192 Cyclic Crude and Intermediate Manufacturing 325199 All Other Basic Organic Chemical Manufacturing

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00402061 1 Inactive 06/19/00 NA No
Description from Generator: Scrap metal electrical capacitors with Wemcol Oil Waste inactivated due to one-time shipment.
Form Code: 206 Waste oil
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

** No Longer Generated Wastes **

00424881 1 Inactive 06/19/00 NA No

Description from Generator: Scrap lumber treated with wood preservatives Waste inactivated due to one-time shipment.
Form Code: 488 Wood debris
Current Management Units: None
* Origin Codes: 7 Cor action/closure

7777409H H Inactive 03/29/00 NA No No

Description from Generator: ONE TIME SHIPMENT: Dodecyl mercaptan & methyl methacrylate/one time shipment manufact. mistake
Form Code: 409 Other non-halogenated organic solids
EPA Hazardous Waste Numbers: D001
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Measurement Points: 1 Before mixing

150430 1 Inactive 02/19/98 NA No No

Description from Generator: OIL SLUDGE, HEAVY
Form Code:
Current Management Units: None
* Origin Codes:

170440 1 Inactive 02/19/98 NA No No

Description from Generator: FILTER CAKE, MEDIA WASTES
Form Code:
Current Management Units: Misc Store Container 005
* Origin Codes:

171210 1 Inactive 02/19/98 NA No No

Description from Generator: ABSORBANT WASTES
Form Code:
Current Management Units: None
* Origin Codes:

173340 1 Inactive 02/19/98 NA No No

Description from Generator: FILTER WASTES
Form Code:
Current Management Units: None
* Origin Codes:

179360 1 Inactive 02/19/98 NA No No

Description from Generator: SOIL, HYDROCARBON CONTAMINATED
Form Code:
Current Management Units: None
* Origin Codes:

179390 1 Inactive 02/19/98 NA No No

Description from Generator: ASBESTOS INSULATON
Form Code:
Current Management Units: Contain Store Area 004
* Origin Codes:

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
** No Longer Generated Wastes **						
183140	1	Inactive	02/19/98	NA	No	No
Description from Generator: FILTER MEDIA, CONTAMINATED						
Form Code:						
Current Management Units: None						
* Origin Codes:						
249890	2	Inactive	01/04/95	NA	No	No
Description from Generator: BIOLOGICAL SLUDGE, INDUSTRIAL WASTEWATER TREATMENT						
Form Code:						
Current Management Units: Surface Impoundment 002						
* Origin Codes:						
270970	2	Inactive	02/19/98	NA	No	No
Description from Generator: CATALYST, SILICA-ALUMINA						
Form Code:						
Current Management Units: None						
* Origin Codes:						
272680	2	Inactive	02/19/98	NA	No	No
Description from Generator: CONTAINERS, TRIPLE RINSED						
Form Code:						
Current Management Units: None						
* Origin Codes:						
279760	2	Inactive	02/19/98	NA	No	No
Description from Generator: PLANT REFUSE, GENERAL MISC.						
Form Code:						
Current Management Units: None						
* Origin Codes:						
281120	2	Inactive	02/19/98	NA	No	No
Description from Generator: REACTOR VESSEL CLEANINGS						
Form Code:						
Current Management Units: None						
* Origin Codes:						
903540	H	Inactive	02/19/98	NA	No	No
Description from Generator: WASTEWATER, PROCESS						
Form Code: 207 Concentrated aqueous solution of other organics						
EPA Hazardous Waste Numbers: D018						
Current Management Units: None						
* Origin Codes: 1 Onsite-process/service						
* Source Codes: A75 Wastewater treatment						
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing						

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
** No Longer Generated Wastes **						
909750	H	Inactive	02/05/93	NA	No	No
910450	H	Inactive	02/05/93	NA	No	No
910650	H	Inactive	02/19/98	NA	No	No
911080	H	Inactive	02/19/98	NA	No	No
914820	H	Inactive	02/19/98	NA	No	No

909750
Description from Generator: ORGANICS, COMBUSTIBLE & WATER
Form Code:
Current Management Units: None
* Origin Codes:

910450
Description from Generator: OIL, WASTE
Form Code:
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: None
* Origin Codes:

910650
Description from Generator: PAINT WASTE, LIQUID
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D001 D018 D039
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A04 Flush rinsing
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing

911080
Description from Generator: METHANOL
Form Code: 219 Other organic liquids
EPA Hazardous Waste Numbers: D001
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A33 Product distillation
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing

914820
Description from Generator: ORGANICS, HEAVY
Form Code: 219 Other organic liquids
EPA Hazardous Waste Numbers: D001 D018
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A33 Product distillation
* NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing

30316 The Goodyear Tire & Rubber Company

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
** No Longer Generated Wastes **						
982050	H	Inactive	02/19/98	NA	No	No
Description from Generator: XYLENE CONTAMINATED MATERIAL						
Form Code:						
EPA Hazardous Waste Numbers: D001 F003						
Current Management Units: None						
* Origin Codes:						
983990	H	Inactive	02/19/98	NA	No	No
Description from Generator: CARBON, ACTIVATED, SPENT, CONTAMINATED						
Form Code:						
Current Management Units: None						
* Origin Codes:						
984620	H	Inactive	01/04/95	NA	No	No
Description from Generator: CLAY, ORGANIC CONTAMINATED						
Form Code:						
Current Management Units: Contain Store Area 004						
* Origin Codes:						

* The first value is considered the primary value (e.g. primary origin code).
As of 03/13/2002, the next unassigned sequence number for WASTES is 7778.

30316 The Goodyear Tire & Rubber Company

**** UNITS AT THIS SITE MANAGING WASTE ****

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date

** 'Active' & 'Closure Pending' Units **

---

003 Boiler Active 11/01/83 H/ NA NA IN2 RCRA Pmt Exempt-Recycling Unit NA /
Description from Company: Steam Generating Boiler- Recovers BTU value from waste stream
Capacity: 1.0000 Capacity Unit of Measure: U
System Types: 051 Energy recovery - liquids
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 0019219H Waste meth 0020219H Organic he
Wastes Previously Managed in Unit: 0006203H 909750 910450

---

004 Contain Store Area Active 1 2 H/ NA NA NA NA /
System Types:
Wastes Currently Managed in Unit: 00012191 Wingstay S 00024091 Diphenylam 00034091 Scrap hydr 00043011 Soil conta 0007319H Spent flou
00143111 Asbestos s 00166061 Resins, ta 00212061 Used lube, 00222191 Scrap Wing 0023301H Soil conta
0024219H Scrap styr 00253191 Scrap dibu 0026202H Spent 1,1, 00292191 Contaminat 0031203H Scrap N-N1
0032209H Residual p 0034211H Paint thin 0036489H Non ACM in 0043306H Vessel cle 00440031 mixed lab
00453012 soil conta 179390 ASBESTOS I 984620 CLAY, ORGA
Wastes Previously Managed in Unit: 00082191 0013319H 0028319H 0030409H

---

005 Misc Store Container Active 1 2/ NA NA NA NA /
Description from Company: SLUDGE BOX
System Types:
Wastes Currently Managed in Unit: 00043011 Soil conta 00093191 Wingstay 2 00373072 Scrap meta 00383891 Sandblasti 00469992 plant tras
170440 FILTER CAK
Wastes Previously Managed in Unit: 00159022 00273191 00424881

---

006 WWTP Active 02/23/94 1 H/ NA NA NA RCRA Pmt Exempt-W.W.T. NA /
Description from Company: C-801 Wastewater steam stripping column located west end of 300 unit.
System Types: 083 Air/steam oxidation
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 00051011 Class 1 No 0017101H Process wa

---

007 Misc Store Container Active 10/27/94 2/ NA NA NA Non-Hazardous Regulated NA /
Description from Company: Scrap metal storage box
Capacity: 30.0000 Capacity Unit of Measure: Y
System Types: 141 Storage
Wastes Currently Managed in Unit: 00123082 Empty or c

---

008 WWTP Active 01/04/95 H/ NA NA NA RCRA Pmt Exempt-W.W.T. NA /
Description from Company: V-414 wastewater/organics phase separator. Located south end of tank farm
System Types: 085 Other aqueous organic treatment 124 Phase separation
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 0017101H Process wa

30316 The Goodyear Tire & Rubber Company

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
** 'Active' & 'Closure Pending' Units **								
009	WWTP	Active	01/04/95	H/ NA	NA	NA	RCRA Pmt Exempt-W.W.T.	NA /
Description from Company: V-541 oil/water separator. Located at Southeast corner of 300 Unit.								
System Types: 085 Other aqueous organic treatment 124 Phase separation								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0017101H Process wa								
010	WWTP	Active	01/04/95	1 H/ NA	NA	NA		NA /
Description from Company: V-801 Temporary wastewater storage tank. Located 50' West of V-407.								
System Types: 141 Storage								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 00051011 Class 1 No 0017101H Process wa								
011	Tank (Surface)	Active	01/04/95	1/ NA	NA	NA	Non-Hazardous Regulated	NA /
Description from Company: V-406 Storage tank for Alkylator heavies.								
System Types: 141 Storage								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 00332191 Alkylator								
012	Tank (Surface)	Active	01/04/95	H/ NA	NA	NA	RCRA Pmt Exempt - Accumulation Time	NA /
Description from Company: Storage tank, 88,000 gallon, steel, V-411								
System Types: 141 Storage								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0019219H Waste meth 0020219H Organic he								
Wastes Previously Managed in Unit: 0006203H								
013	WWTP	Active	11/20/95	H/ NA	NA	NA	RCRA Pmt Exempt-W.W.T.	NA /
Description from Company: V-531 Wastewater/ Organics phase separator. Located south end of tank farm.								
System Types: 085 Other aqueous organic treatment 124 Phase separation								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0017101H Process wa								
014	WWTP	Active	12/02/96	H/ NA	NA	NA	RCRA Pmt Exempt-W.W.T.	NA /
Description from Company: V-526 Wastewater/oil separator								
System Types: 124 Phase separation								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0017101H Process wa								
015	WWTP	Active	12/02/96	H/ NA	NA	NA	RCRA Pmt Exempt-W.W.T.	NA /
Description from Company: V-802 Wastewater Feed Tank to C-801								
System Types: 141 Storage								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0017101H Process wa								

As of 03/13/2002, the next unassigned sequence number for UNITS is 016.

30316 The Goodyear Tire & Rubber Company

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
** 'Inactive', 'Closed' & 'Post Closure Care' Units **								
001	Surface Impoundment	Inactive		/ NA	NA	NA		Yes/04/01/90
Description from Company: CAP-6770 CU YDS								
System Types:								
Wastes Previously Managed in Unit: 249890								
002	Surface Impoundment	Closed	09/21/99	2/ NA	NA	IN1	RCRA Interim Status Unit	NA /
Description from Company: Aeration Pond (total volume 2,225,000 gallons)								
Capacity: 0.8500 Capacity Unit of Measure: A								
System Types:								
Biennial System Regulatory Status: Regulatory status unknown								

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

April 10, 2001

Mr. Stephan R. Surofchek
Environmental Coordinator
Goodyear Tire and Rubber Company
13441 Bay Area Boulevard
Pasadena, TX 77507

7000 0520 0023 2380 7487
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Goodyear Tire and Rubber Company (Goodyear)
Industrial Solid Waste Registration No. 30316
Hazardous Waste Permit No. HW-50024
Closure Certification Report for Boiler M-526 and Storage Vessel V-411
Document No. 4471

Dear Mr. Surofchek:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed your Closure Certification Report dated September 2000 (and revised March 2001?) addressing the closure of Boiler M-526 (NOR Unit No. 003) and Storage Vessel V-411 (NOR Unit No. 012). Based on the information provided the TNRCC accepts that the closure of Boiler M-526 and Storage Vessel V-411 was completed in accordance with 40 CFR §264.110 through §264.115 and the risk reduction standards under 30 TAC §335 Subchapter S.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the closure fails to comply with these requirements, the burden remains upon Goodyear to take any necessary and authorized action to correct such conditions.

Should you have any questions, please contact Mr. Steve Akers of the I&HW Permits Section at 512/239-1141. If responding by letter please use mail code (MC-130) after the recipient's name.

Sincerely,

William J. Shafford, P.E.

William J. Shafford, P.E.
Facility Team 1
Industrial and Hazardous Waste Permits Section
Waste Permits Division

WJS/SKA/fp

cc: Mr. Steve Akers

Att. 4

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 20, 2002

Ms. Bonnie Bainter
Environmental Specialist
The Goodyear Tire and Rubber Company
13441 Bay Area Boulevard
Pasadena, TX 77507

7001 2510 0000 5812 8828
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Withdrawal of Hazardous Waste Permit Application
The Goodyear Tire and Rubber Company - Bayport Chemical Plant
Proposed Hazardous Waste Permit No. HW- 50024
Industrial Solid Waste Registration No. 30316
WWC No. 10146456

Dear Ms. Bainter:

The Texas Natural Resource Conservation Commission (TNRCC) has received your letter dated August 5, 2002, withdrawing the hazardous waste permit application submitted on September 23, 1991. The referenced permit application is hereby considered withdrawn.

Should you have any questions regarding this withdrawal, please contact Ms. Joy H. Archuleta of the Industrial and Hazardous Waste Permits Section at 512/239-6614, or by correspondence, include Mail Code 130 (MC 130) in the letterhead address.

Sincerely,

Katherine Nelson

Katherine Nelson, Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division

KN/JHA/cm

cc: Ms. Joy H. Archuleta, TNRCC I&HW Permits Section, Waste Permits Division

AH.8

TCEQ Region 12 **IHW Registration No.** 30316 **Investigation Date** 05/21/03

TANKS TABLE

(@) Tank Fac Status	Tank Capacity (Gallons)	Tank Identity	NOR Facility Number	Location	New or Existing pre 7/14/86 Tank	Date put into Service / Date due 2d Cont.	Waste Handled (NOR Waste Stream No.) / Violation of Rules, list with Sect. & Q No. only
NH	66,101	V-406	011	Tank farm	N/A	N/A	00332191
						N/A	None
Closed/ Exempt	88,000	V-411	012	S. end of tank farm	Existing	N/A - Closed	None
						N/A	30 TAC 335.6(c)
WWTP	N/A	C-801	006	W. end of 300 Unit	N/A	N/A	00051011 & 0017101H
						N/A	None
WWTP	N/A	V-414	008	S. end of tank farm	N/A	N/A	0017101H
						N/A	None
WWTP	N/A	V-541	009	SE corner of 300 Unit	N/A	N/A	0017101H
						N/A	None
WWTP	N/A	V-801	010	W. of V-407	N/A	N/A	00051011 & 0017101H
						N/A	None
WWTP	N/A	V-531	013	S. end of tank farm	N/A	N/A	0017101H
						N/A	None
WWTP	N/A	V-526	014	S. end of tank farm	N/A	N/A	0017101H
						N/A	None
WWTP	N/A	V-802	015	S. end of tank farm	N/A	N/A	0017101H
						N/A	None

NOTE: (@) Identify tanks as to Facility status, i.e. P-permitted, I-interim status, E- exempt 90-day storage, S-small quantity generator, and NH-nonhazardous

Att. 9

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 7, 2000

Mr. Stephan R. Surofchek
The Goodyear Tire and Rubber Company
13441 Bay Area Blvd.
Pasadena, Texas 77507

Re: Goodyear Tire and Rubber Company - Bayport Chemical Plant, Pasadena, Texas;
TNRCC Solid Waste Registration No. 30316;
EPA I.D. No. TXD074185141;
CAS Project Nos. 2049, 4452, 4733 and 6709;
Interim-Status Hazardous Waste Management Unit - Aeration Lagoon
Acceptance of Deed Certification and Release From Post-closure Care Responsibilities

Dear Mr. Surofchek:

The Texas Natural Resource Conservation Commission (TNRCC) received your transmittal letter dated November 27, 1999, which enclosed a copy of the proof of deed certification for the closed interim-status aeration lagoon. The deed certification states that contaminants remaining at the site have been remediated to meet non-residential (i.e. industrial/commercial) soil criteria under Risk Reduction Standard (RRS) No. 2 pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S.

In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health-based standards and criteria. Contaminants allowed to remain in place in media of concern (i.e., soil, ground water, surface water and air) must not exceed the health-based clean up levels as specified in 30 TAC §335.556. The final report documented that remediation of the aeration lagoon has attained RRS No. 2 such that no post-closure care or engineering control measures are required. The report was previously approved by the TNRCC in our letter dated August 31, 1999.

After review of the proof of deed certification, it appears that the deed certification requirements of 30 TAC §335.560(b) and (c) have been completed. The TNRCC hereby releases the facility from post-closure care responsibilities for the former interim-status aeration lagoon.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state,

a nuisance, or the endangerment of the public health and welfare as required by Title 30 TAC §335.4. If the actual closure fails to comply with these requirements, the burden remains upon Goodyear Tire and Rubber Company - Bayport Chemical Plant, Pasadena, Texas to take any necessary and authorized action to correct such conditions.

Regarding your plan to continue the assessment of groundwater, as specified in Section 5.6 of the final report, the TNRCC had previously approved this plan. To reiterate, this plan specifies that groundwater monitoring will continue for a period of two years from the completion of closure activities. After completion of groundwater monitoring period, Goodyear Tire and Rubber Company is required to submit a groundwater report indicating the findings and conclusions of the investigation. If groundwater monitoring results reaffirm the current conclusion that RRS No. 1 and/or RRS No. 2 levels have been attained, Goodyear Tire and Rubber Company will state this fact and will request the TNRCC to terminate the groundwater monitoring. In the event that a RRS No. 1 or RRS No. 2 is not met, Goodyear Tire and Rubber Company is required to submit a work plan for groundwater remediation. For all reports, the information contained will conform to the requirements as specified in 30 TAC 335.553(a). All reports will be subject to TNRCC review, modification, or approval.

A TNRCC field inspector may review your final report and deed certification information and conduct a closure inspection of the site.

Questions concerning this letter should be directed to my attention at 512.239.2371. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TNRCC Region 12 Office in Houston. The TNRCC Solid Waste Registration Number and CAS Project Nos. 2049, 4452, 4733 and 6709 should be referenced in all submittals.

Sincerely,

Sonny Rayos, Project Manager
Team I, Corrective Action Section
Remediation Division

SPR/spr

cc: Mark Whitmore, Goodyear Tire and Rubber Company, Akron, OH
Robert Perkins, Law Environmental Inc., Louisville, KY
Marsha Hill, Waste Program Manager, TNRCC Region 12 Office, Houston
Linda Shirk, Financial Assurance Section, OAS (MC-184)
Anne Rhyne, Waste Evaluation Section, OWM (MC-129)

AA. 10

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 26, 2001

RECEIVED
JUL 30 2001
REGION 12

Mr. Stephan R. Surofchek
The Goodyear Tire and Rubber Company
13441 Bay Area Blvd.
Pasadena, Texas 77507

Re: Goodyear Tire and Rubber Company - Bayport Chemical Plant, Pasadena, Texas;
TNRCC Solid Waste Registration No. 30316;
EPA I.D. No. TXD074185141;
Interim-Status Hazardous Waste Management Unit - Aeration Lagoon
Request to terminate groundwater monitoring and plugging of wells - APPROVAL

Dear Mr. Surofchek:

The Texas Natural Resource Conservation Commission (TNRCC) received the report entitled *Third Quarter Groundwater Monitoring Report and Summary of Annual Monitoring* dated January 22, 2001. The results of eight calendar quarters of groundwater monitoring indicate that previous closure activities successfully removed contaminants that could potentially leach into the groundwater; no release to the groundwater was detected. On the basis of these results, Goodyear requests approval from the TNRCC to terminate the groundwater monitoring and to plug and abandon all monitor wells and piezometer.

The TNRCC has reviewed the above-mentioned report and concurs that groundwater monitoring is no longer necessary. The TNRCC also approves your request to plug and abandon groundwater monitor wells and piezometer. Please note that plugging and abandonment of wells shall be according to the standards specified in 16 Texas Administrative Code (TAC) §76.1004 (see Enclosure No. 1). A **copy** of the Plugging Report shall be submitted to the TNRCC within 30 days after the completion of plugging activities as required §76.700 (see Enclosure No. 2).

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by Title 30 TAC §335.4. If the actual closure fails to comply with these requirements, the burden remains upon Goodyear Tire and Rubber Company - Bayport Chemical Plant, Pasadena, Texas to take any necessary and authorized action to correct such conditions.

Questions concerning this letter should be directed to my attention at 512.239.2371. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TNRCC Region 12 Office in Houston. The TNRCC SWR No. 30316 should be referenced in all submittals.

Sincerely,

Sonny Rayos, Project Manager
Team I, Corrective Action Section
Remediation Division
Texas Natural Resource Conservation Commission

cc: Mark Whitmore, Goodyear Tire and Rubber Company,
1144 East Market St.,Akron, OH 44316
Robert Perkins, Law Engineering and Environmental Services, Inc.,
9810 Bluegrass Parkway, Louisville, KY40299
Waste Program Manager, TNRCC Region 12 Office, Houston

Enclosures: 1. Copy of 16 TAC §76.1004
2. Copy of 16 TAC §76.700

THE GOODYEAR TIRE & RUBBER COMPANY **TXD074185141**
PASADENA, HARRIS COUNTY TEXAS Region 06

Universes

Generator:	LQG	Full Enforcement:	----	Subj CA:	X	Perm Prgrs:	L-BS-	Op Pmt GPRA:	X+
Transporter:		Operating TSDF:	----	Subj CA TSD 3004:		Perm Wrkld:	----	PClos GPRA:	X+
		BOYSNC:		Subj CA TSD Discr:	X	Clos Wrkld:	----	CA GPRA:	
		SNC:		Subj CA Non-TSD:		Pclos Wrkld:	----	CA HE EI:	
		Annual BOY Enf:	X	CA Wrkld:				CA GW EI:	

CA Authority	Suborg.	Staff	Attny	Resp. Agy	Loc.	Issue Date	Effective Date
Agency Policy/Procedure		TX	TX	EPA	TX	03/31/1992	03/31/1992
*Other, specified by Legal Authority Citation							

Area Name	Seq.	Releases:	GW:	SW:	Soil:	Air:	Facilitywide:	Y
ENTIRE FACILITY	1							

Event Code	Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
CA075ME	1	EPA	TX	04/29/1992		
CA PRIORITIZATION-MEDIUM CA PRIORITY						
CA225YE	1	EPA	TX	04/09/1992		
STABILIZATION MEASURES EVALUATION-FACILITY IS AMENABLE TO STABILIZATION						
CA050RF	1	EPA	TX	03/31/1992		
RFA COMPLETED-ASSESSMENT WAS A RFA						
CA070NO	1	State	TX	03/31/1992		
DETERMINATION OF NEED FOR A RFI-RFI IS NOT NECESSARY						

Austin File Review, EPA Region 6
Communication Log

Site Name: The Goodyear Tire & Rubber Co. (SWR 30316)

Contact Name: Alma Walker

Contact Phone: 713-767-3605

Contact Title: Environmental Investigator

Contact E-Mail: ?

Date Contacted: 4/26/06

Time Contacted: 1202 Hrs

Contacted By: Maxine LaPierre

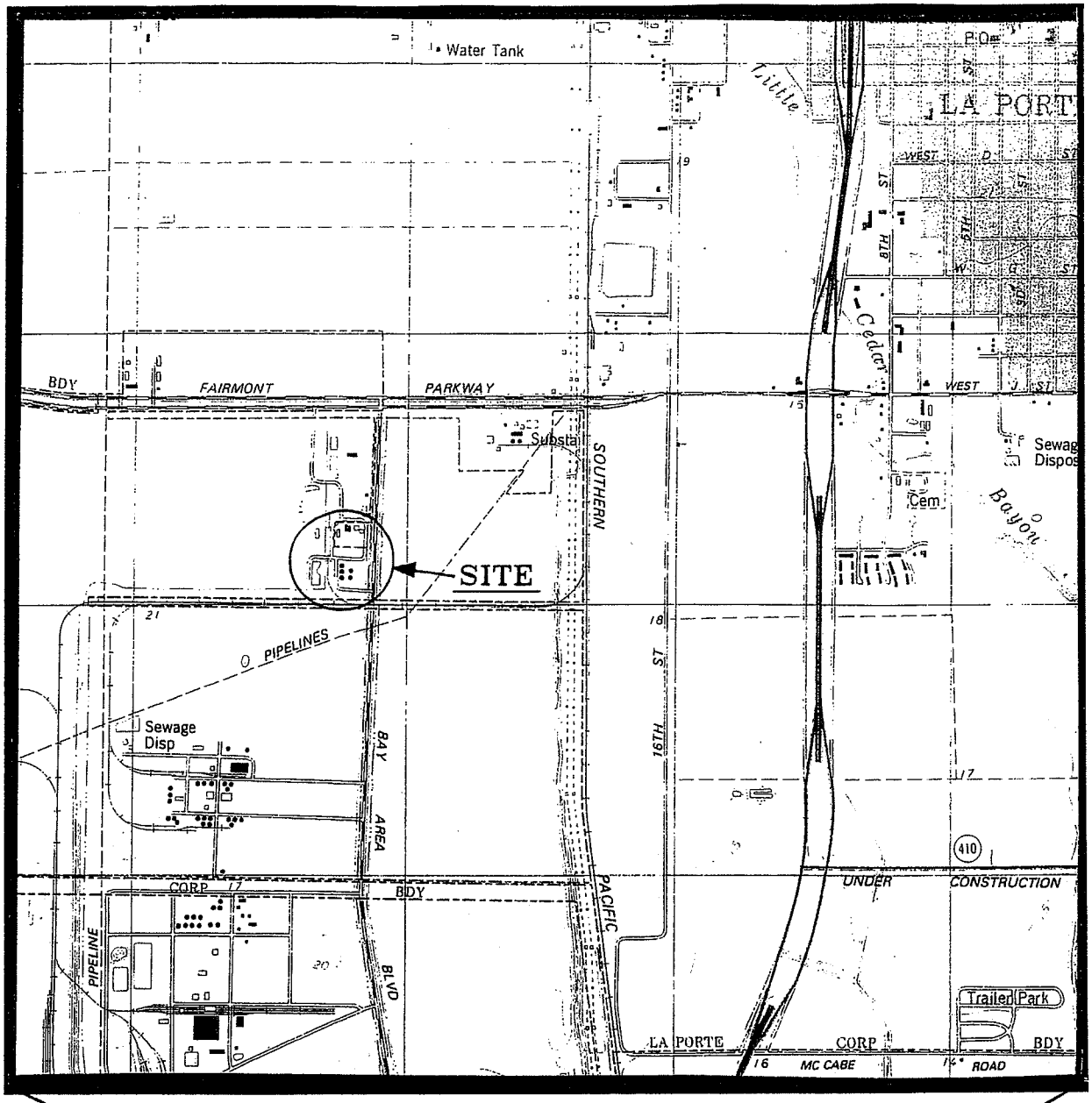
Summary of Communication:

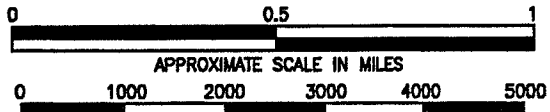
Called, left voice message - explained Tech Law work in TCEQ files review. Requested status update ~~of~~ for surface impoundment (NOR # 001). 5/21/03 CEI report indicated TCEQ requested Goodyear to submit information and noted it as an Area of Concern in the report. Impoundment listed as "inactive" on the NOR. Left my tel. #. TCEQ had requested documentation of the closure status of the surf. impoundment.

1412 Hrs Spoke with Ms. Walker. Indicated she had not yet received any information from Goodyear and that the TCEQ's Area of Concerned is ~~unresolved~~ mx unresolved. She thought Goodyear couldn't locate records. TCEQ will follow-up during the next facility investigation. No other problems at facility as far as she knows.

SOURCE: U.S. GEOLOGICAL SURVEY; 7.5 MINUTE SERIES (TOPOGRAPHIC)
LaPORTE, TEXAS QUADRANGLE; DATED 1982

N





QUADRANGLE LOCATION

Scan + add to CA-750

GOODYEAR TIRE & RUBBER CO.
BAYPORT FACILITY
PASADENA, TEXAS

PROJECT NO. 50521-8-6648

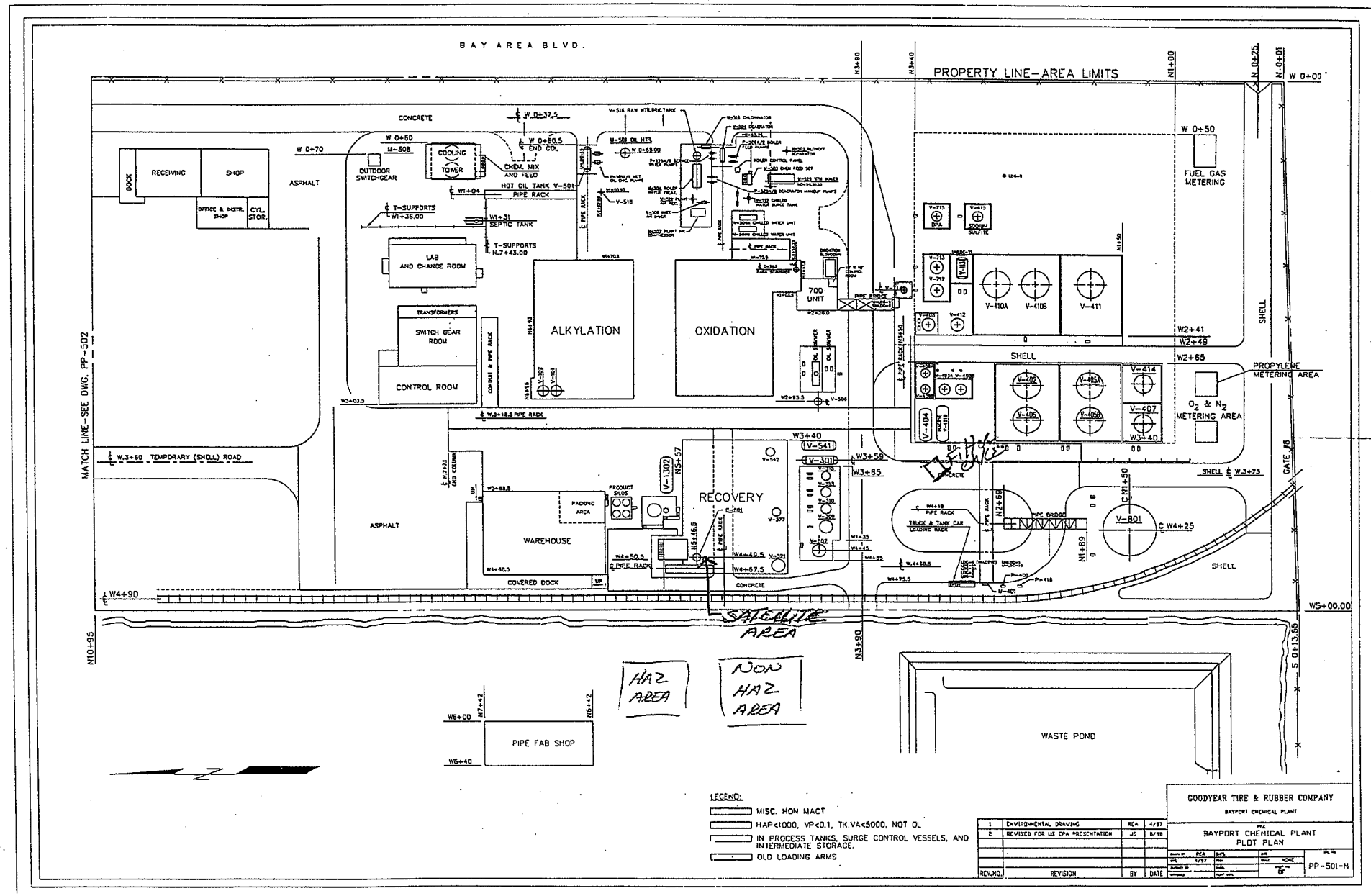
LAW
ENGINEERING AND ENVIRONMENTAL SERVICES, INC.
9810 BLUEGRASS PARKWAY
LOUISVILLE, KENTUCKY 40299
(502) 495-5800
FAX (502) 495-5801

SITE LOCATION MAP

CADD FILE: 991023
PLOT DATE: 01/27/98

FIGURE 1

SWR#30316

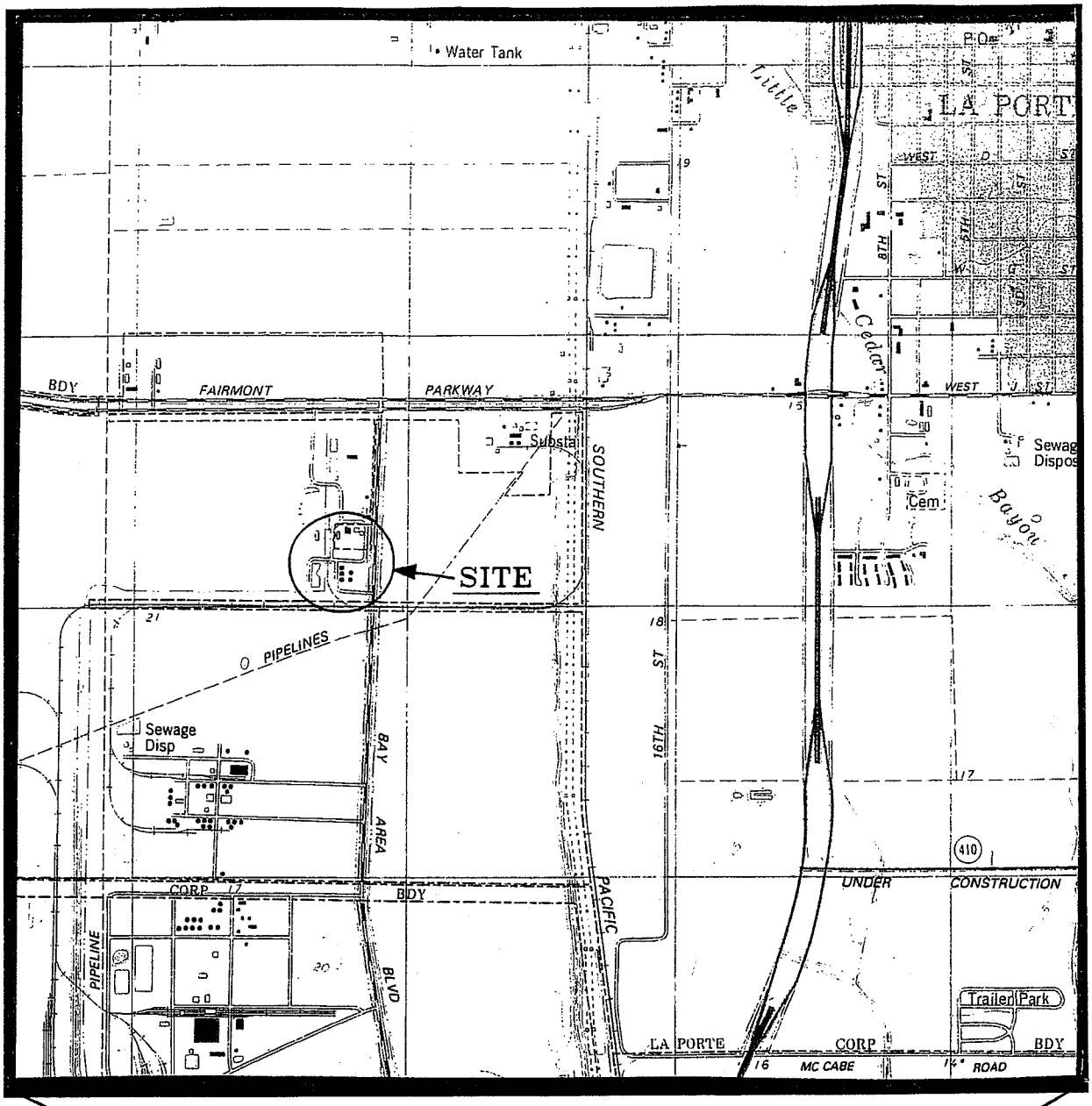


REV.NO.	REVISION	BY	DATE
1	ENVIRONMENTAL DRAWING	RCA	4/97
2	REVISED FOR US EPA PRESENTATION	JS	8/98

GOODYEAR TIRE & RUBBER COMPANY
BAYPORT CHEMICAL PLANT
BAYPORT CHEMICAL PLANT
PLOT PLAN
PP-501-H

SOURCE: U.S. GEOLOGICAL SURVEY; 7.5 MINUTE SERIES (TOPOGRAPHIC)
LaPORTE, TEXAS QUADRANGLE; DATED 1982

N



0 0.5 1
APPROXIMATE SCALE IN MILES

0 1000 2000 3000 4000 5000
APPROXIMATE SCALE IN FEET

QUADRANGLE LOCATION

Scan, add to CA 725

GOODYEAR TIRE & RUBBER CO.
BAYPORT FACILITY
PASADENA, TEXAS

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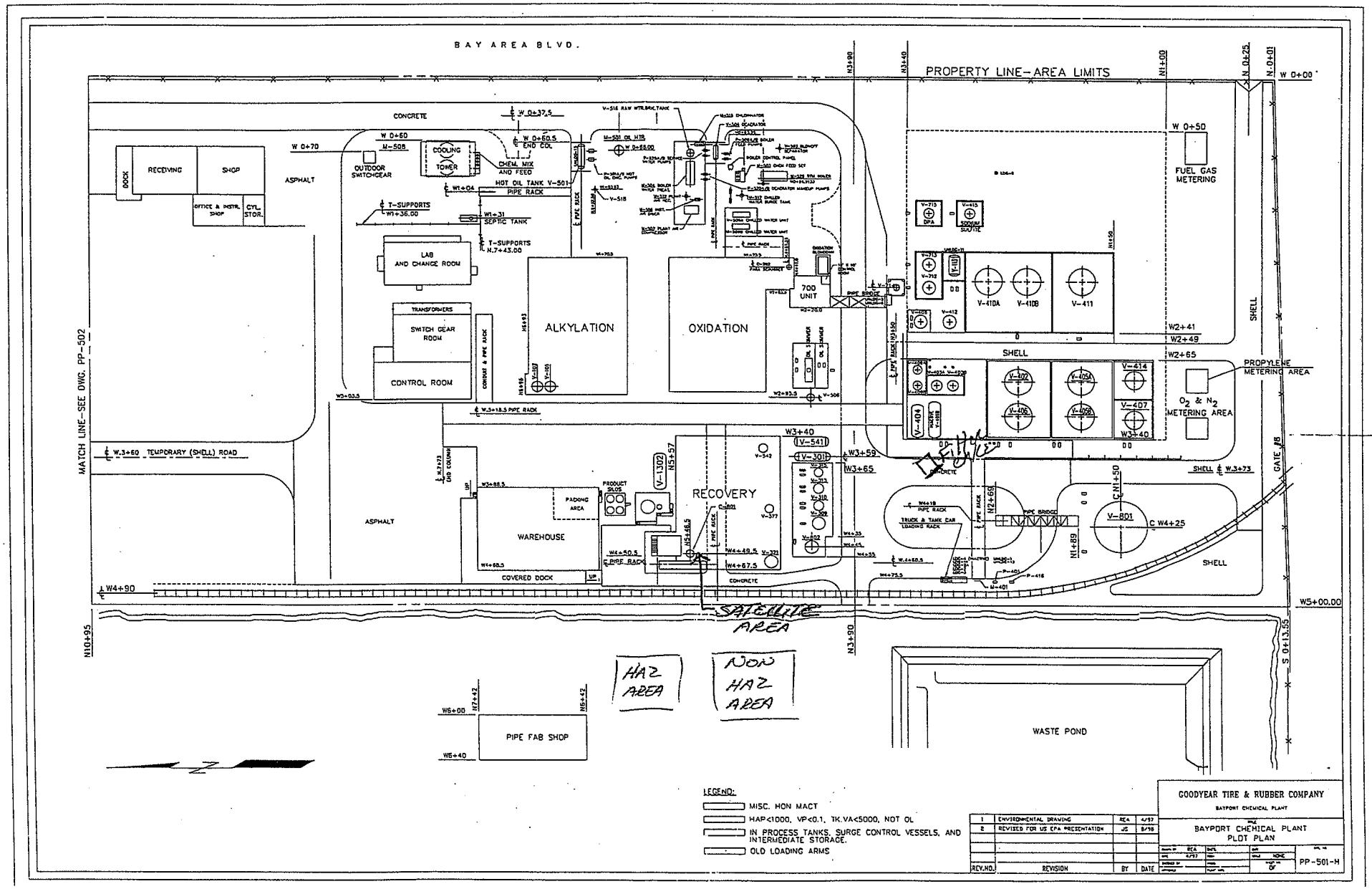
BAY AREA BLVD.
PROPERTY LINE–AREA LIMITS
MATCH LINE–SEE DWG. PP-502
CONCRETE
ASPHALT
RECEIVING
SHOP
DOCK
OFFICE & INSTR. SHOP
CYL. STOR.
OUTDOOR SWITCHGEAR
COOLING TOWER
CHEM. MIX AND FEED
END COL
HOT OIL TANK V-501
PIPE RACK
T-SUPPORTS
SEPTIC TANK
LAB AND CHANGE ROOM
TRANSFORMERS
SWITCH GEAR ROOM
CONTROL ROOM
ALKYLATION
OXIDATION
700 UNIT
FUEL GAS METERING
V-410A
V-410B
V-411
SHELL
PROPYLENE METERING AREA
O_2 & N_2 METERING AREA
V-407
V-414
TEMPORARY (SHELL) ROAD
WAREHOUSE
PADDING AREA
COVERED DOCK
RECOVERY
V-541
V-301D
V-1302
PRODUCT DILOG
TRUCK & TANK CAR LOADING RACK
V-801
GATE #5
SATELLITE AREA
HAZ AREA
NON HAZ AREA
PIPE FAB SHOP
WASTE POND
LEGEND:
MISC. HON MACT
HAP<1000, VP<0.1, TK.VA<5000, NOT OL
IN PROCESS TANKS, SURGE CONTROL VESSELS, AND INTERMEDIATE STORAGE.
OLD LOADING ARMS
GOODYEAR TIRE & RUBBER COMPANY
BAYPORT CHEMICAL PLANT
BAYPORT CHEMICAL PLANT PLOT PLAN
PP-501-H
REV.NO. REVISION BY DATE
1 ENVIRONMENTAL DRAWING RCA 4/97
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